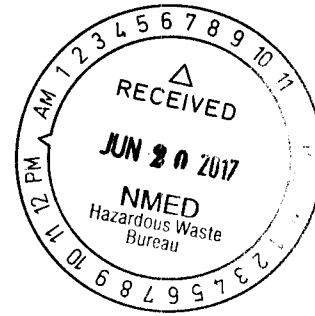


ENTERED



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
JUN 20 2017



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 Documentation Supporting Completion of the Corrective Actions for CBFO CAR 17-032 – Audit A-17-21

Dear Ms. McDaniel:

The Carlsbad Field Office (CBFO) has verified the documentation provided by the Waste Disposition Division for 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. The results of the evaluation are provided in the enclosed CAR Continuation Sheets.

The results of the evaluation indicate that the corrective actions for CAR 17-032 provide adequate measures to address the impact/extent and reduce the likelihood of recurrence of the condition noted in the CAR. The verification concluded that the associated corrective actions are acceptable. The CAR is considered closed.

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

Sincerely,

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

M. Brown, CBFO	*ED	T. Peake, EPA	ED
D. Miehl, CBFO	ED	J. Kieling, NMED	ED
M. Stapleton, CBFO	ED	R. Maestas, NMED	ED
M. Fineran, CBFO	ED	D. Biswell, NMED	ED
E. Garza, CBFO	ED	T. Runyon, CTAC	ED
R. Elmore, CBFO	ED	P. Martinez, CTAC	ED
M. Heard, CBFO	ED	M. Leroch, CTAC	ED
B. Covert, NWP	ED	C. Castillo, CTAC	ED
J. Britain, NWP	ED	P. Hinojos, CTAC	ED
B. P. Shagula, NWP	ED	J. Vernon, CTAC	ED
V. Ballew, NWP	ED	C. Chester, CTAC	ED
S. Punchios, NWP	ED	G. White, CTAC	ED
A. Boyea, NWP	ED	CBFO QA File	
J. Ellis, NWP	ED	CBFO M&RC	
J. Walsh, EPA	ED	*ED denotes electronic distribution	



CAR CONTINUATION SHEET

1. CAR No: 17-032

2. Activity No: A-17-21

3. Page 1 of 2

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) 17-032, including objective evidence and supporting documentation, submitted via Nuclear Waste Partnership LLC (NWP) letter QA:17:00199, dated June 6, 2017, from Ms. Mary McDaniel, Manager Quality Assurance, to Mr. M. Navarrete, CBFO 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:

- 1. 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.*
- 2. NCR-RHORNL-0369-17 has been issued to address and resolve the CAR condition.*
- 3. As directed in the disposition of NCR-RHORNL-0369-17, BDR ORRHDTTC16029 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.*

Verification:

Remedial actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:MN:RMS:17-1909: UFC 2300.00.

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.

Verification:

Investigative actions for both the extent and impact were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:MN:RMS:17-1909: UFC 2300.00.

CAUSAL ANALYSIS:

Not requested.

CAR CONTINUATION SHEET

1. CAR No: 17-032	2. Activity No: A-17-21	3. Page 2 of 2
-------------------	-------------------------	----------------

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.

COMMITMENTS

DUE DATES


<i>CCP to re-confirm that the correct scale calibration due date is April 13, 2017, not April 13, 2016</i>	<i>Complete</i>
<i>CCP to issue NCR-RHORNL-0369-17 to address and resolve the CAR condition.</i>	<i>Complete</i>
<i>CCP to perform extent-of-condition review 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</i>	<i>Complete</i>
<i>Per the disposition in NCR-RHORNL-0369-17, CCP to send BDR ORRHDTC16029 back for Data Generation Level and Project Level re-review and re-approval.</i>	<i>May 26, 2017</i>
<i>CCP to issue a Lessons Learned stressing the very limited circumstances under which changes may be treated as minor/editorial</i>	<i>May 30, 2017</i>
<i>Provide closure documentation to NWP Quality Assurance (QA)</i>	<i>June 21, 2017</i>
<i>NWP QA, transmit closure documentation to the CBFO</i>	<i>June 28, 2017</i>

Verification:

The objective evidence submitted in this closure package was reviewed and verified to meet the required actions to preclude recurrence commitments. The evidence included (1) scale calibration; (2) NCR-RHORNL-0369-17, Rev. 1; (3) BDR corrections; (4) extent-of-condition review performed 5/3/17 by the Central Characterization Program (CCP) Site Project Manager; and (5) Lessons Learned Number LL-2017-05 describing minor/editorial changes that can be made to a record.

CONCLUSION

Based on the results of the review and verification of the original objective evidence included in the CAR 17-032 closure package, it is recommended that CAR 17-032 be closed.


Verification Performed By: Jim Vernon, NQA-I Lead Auditor

6-19-17
Date