

 ENTERED



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
JUL 18 2017



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

Subject: Evaluation and Acceptance of the CAP for CAR 17-037

Dear Ms. McDaniel:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plan (CAP) associated with Corrective Action Report (CAR) 17-037. As documented on the enclosed CAR Continuation Sheet, the evaluation indicates that the CAP is acceptable.

CBFO will continue to evaluate the progress and sufficiency of the CAP activities prior to formal closure of CAR 17-037.

If you have any questions or comments concerning the CAP evaluation, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl
Senior Quality Assurance Specialist

Enclosure



Ms. Mary McDaniel

-2-

cc: w/enclosure

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CAR CONTINUATION SHEET

1. CAR No: 17-037

2. Activity No: A-17-17

3. Page 1 of 3

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) 17-037. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:17:00222 UFC:2300.00, dated June 21, 2017, from Ms. M. G. McDaniel, Manager, NWP Quality and Contractor Assurance, to Mr. D. S. Miehl, Senior Quality Assurance Specialist, CBFO Office of Quality Assurance.

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

Nonconformance Report (NCR) NCR-LANL-0170-17 has been issued to control the BDRs subject to this CAR condition.

Evaluation:

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

INVESTIGATIVE ACTIONS

Background:

Prior to the requirements established in the current enhanced Acceptable Knowledge (AK) program, CCP management believed it prudent to implement requirements to obtain all possible information concerning any liquids or absorbed liquids in waste containers as a mechanism for providing information for evaluation by the AK Experts. At the time, the program processes for addressing Chemical Compatibility Evaluations (CCEs) and the Basis-of-Knowledge (BoK) were just being developed. Therefore, in December 2015, CCP established CCP Standing Order CCP-SO-LANL-70 to address this concern.

After an incident at TA-55 in August 2016, wherein a waste generator used cheesecloth to clean up a nitric acid spill, Nuclear Process Infrastructure (NPI) at LANL instituted essentially the same requirements as those specified in the CCP Standing Order through the use of a Waste Compliance and Tracking System (WCATS) generated questionnaire form for documenting all chemical constituents present in the waste.

With the evolution of the CCE process and the BoK, the information required to add containers to the AK Tracking Spreadsheet and complete certification has been better defined. The AK experts now have access to the WCATS system and completed WCATS questionnaires for completing waste constituent evaluations.

Extent of Condition

A review of BDRs generated for VE activities at the both the Chemical and Metallurgy Research (CMR) facility and Technical Area (TA) 55 for the past 12 months was performed. This review revealed that 188 BDRs were generated during this time-frame. As a result, only one other instance occurred like the condition in the CAR. This occurred at the CMR facility, wherein BDR LAVE030046 (VE dates spanning 09/16-11/16) notes the identification of "chem-wipes, paper towels, wipe-all, diaper paper, and kim-wipes

CAR CONTINUATION SHEET

1. CAR No: 17-037

2. Activity No: A-17-17

3. Page 2 of 3

(evidence of previously absorbed liquids), but there was no evidence in the BDR to confirm fulfillment of the Standing Order requirements.

As a result, the extent of condition is isolated to 2 instances whereby the requirements of the Standing Order were not implemented.

Impact of Condition

The investigation into these circumstances concluded that the impact of the condition is negligible. There were only two instances identified wherein the requirements of the Standing Order were not fulfilled; the instance identified in this CAR and one additional instance revealed during the extent of condition review. These two isolated instances occurred after the WCATS reporting requirements established by LANL in August 2016, which essentially provided the same requirements as those specified in the Standing Order.

Evaluation:

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

CAUSAL ANALYSIS

Not required.

ACTIONS TO PRECLUDE RECURRENCE

The August 2016 LANL implementation of the WCATS and questionnaire form for documenting all chemical constituents present in the waste will prevent recurrence, and makes CCP Standing Order CCP-SO-LANL-70 unnecessary. The Standing Order has been canceled, and no further corrective actions are deemed necessary to preclude recurrence.

COMMITMENTS

DUE DATES

Generate NCR-LANL-0170-17 to address the BORs subject to this CAR condition

Complete

Cancel CCP Standing Order CCP-SO-LANL-70

Complete

Provide closure documentation to NWP Quality Assurance

July 11, 2017

NWP QA, transmit closure documentation to CBFO

July 18, 2017

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: 17-037

2. Activity No: A-17-17

3. Page 3 of 3

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 17-037, and provide adequate measures for precluding recurrence as identified in the CBFO evaluations. Therefore, it is recommended that the CAP for CAR 17-037 be accepted.


Evaluation Performed By: Porf Martinez, CTAC

7/17/17
Date