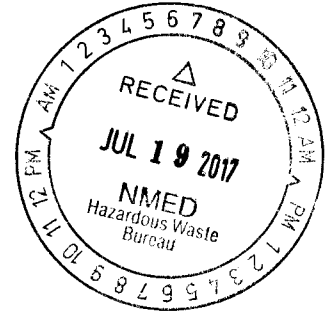




 ENTERED

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
JUL 19 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 CAP for CBFO CAR 17-039 Resulting from CBFO
Audit A-17-23

Dear Ms. McDaniel:

The Carlsbad Field Office (CBFO) has completed its evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 17-039. As documented on the enclosed CAR Continuation Sheets, the evaluation indicates that the CAP is acceptable.

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-

JUL 19 2017

cc: w/enclosure

S. Ross, EM-3.113	*ED
J. Carswell, CBFO	ED
M. Brown, CBFO	ED
J.R. Stroble, CBFO	ED
M. Navarrete, CBFO	ED
M. Stapleton, CBFO	ED
M. Fineran, CBFO	ED
G. Birge, CBFO	ED
N. Castaneda, CBFO	ED
T. Carver, CBFO	ED
J. Zimmerman, DOE-ID	ED
J. Malmo, DOE-ID	ED
J. Vliet, DOE-ID	ED
D. Pruitt, DOE-ID	ED
B. Covert, NWP	ED
J. Britain, NWP	ED
M. Percy, NWP	ED
R. Lee, NWP	ED
R. Reeves, NWP	ED
B. Pace, NWP	ED
C. Simmons, NWP	ED
J. Harvill, NWP	ED
J. Carter, NWP	ED
V. Ballew, NWP	ED
S. Punchios, NWP	ED
A. Boyea, NWP	ED
B. Pyeatt, NWP	ED
J. Walsh, EPA	ED
J. Ellis, EPA	ED
T. Peake, EPA	ED
E. Feltcorn, EPA	ED
R. Joglekar, EPA	ED
J. Kielling, NMED	ED
R. Maestas, NMED	ED
D. Biswell, NMED	ED
P. Martinez, CTAC	ED
C. Castillo, CTAC	ED
M. Leroch, CTAC	ED
K. Gentry, CTAC	ED
J. Schuetz, 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: 17-039

2. Activity No: A-17-23

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) 17-039. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:17:00262 UFC:2300.00, dated July 10, 2017, from Ms. M. G. McDaniel, Manager, NWP Quality and Contractor Assurance, to Mr. D. S. Miehl, Senior Quality Assurance Specialist, CBFO 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

As described in the investigative actions below, the immediate action involved an investigation to determine the cause of the condition noted in the CAR. Two additional remedial actions were identified as a result of the investigation and were taken as follows:

- 1. An email describing the circumstances discovered during the investigation was sent to the appropriate personnel involved to make them aware of the condition and the appropriate actions to take until all the corrective actions have been fulfilled to preclude recurrence.*
- 2. Corrections to the reportability decisions for the two Nonconformance Reports (NCRs) affected by this CAR condition were made in IDC.*

Evaluation:

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

INVESTIGATIVE ACTIONS

Background

When a Project Office Non-conformance Report (NCR) is first entered into Integrated Data Center (IDC) (either initial version or revision) by Quality Assurance (QA), an email is generated and sent to the CCP Certification Manager for a reportability decision. This email contains two links; a link for indicating that the NCR condition is reportable and another link for indicating the NCR condition is not reportable. Once a decision is reached, the Certification Manager clicks on the appropriate link, which then subsequently updates the database indicating whether the NCR condition is reportable or not.

Investigation

A number of test-cases were performed by the IDC programmers in an attempt to understand what created the reporting decision discrepancy between IDC and Revision 1 of NCR-RHINL-0210-16. As a result, the programmers discovered a unique, although rare set of circumstances, that can occur, and when they do, will cause this type of discrepancy. The process of revising a NCR in IDC involves QA personnel accessing the previous version in IDC. When the record is accessed, all the previous NCR information (including results of previous reporting decisions) appears on the screen. In the case of NCR-RHINL-0210-16, Revision 0, the value flag (field) was "checked" indicating that the NCR condition was determined to be reportable. After QA made the necessary changes for Revision 1, the system sent an email to the

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Certification Manager. The Certification Manager determined that the nature of the revision was not reportable and indicated that decision by clicking on the non-reportable link. When the link is checked by the Certification Manager, it updates the database table with that determination decision. However, it is believed (as replicated in the test-cases) that the QA individual had not exited the webpage during the revision update. By not exiting the webpage and leaving it open, the previous value flag (field) indicating the reportable determination in Revision 0 remained "checked". Consequently, when the QA individual exited the webpage, it caused the system to over-write the non-reportable determination in the email from the Certification Manager for Revision 1, and replace it with the original reportable determination made for Revision 0.

Extent of Condition

A historical review of Project Office Nonconformance Reports (NCRs) for the past two years (June 2015 to current) was performed to determine if any other same/similar instances had occurred. A query in the IDC revealed that a total of 271 NCRs had been generated at the Project Office level, four of which, were determined to be reportable. A review of these NCRs identified one additional instance involving NCR-ORNL-0053-15, Revision 2.

Impact of Condition

The impact of the condition is isolated to two NCRs: NCR-RHINL-0210-16 Revision 1 (basis for and referenced in CAR 17-039), and one additional NCR found during the extent of condition; NCR-ORNL-0053-15, Revision 2. In both instances, the initial versions of these NCRs were determined to be reportable and processed in accordance with the requirements in CCP-QP-005 for reportable conditions. The nature of the revisions did not require them to be reported and evidence of these non-reportability decisions are included as an attachment (email from the Certification Manager) for each of these two NCRs. Because CCP-QP-005 requires that the Certification Manager notify the SPM when a NCR is deemed reportable, the difference in the reportability as reflected in the IDC has no impact on the condition (i.e., the process ensures that the condition is reported, if necessary, regardless of what is reflected in IDC).

Evaluation:

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

CAUSAL ANALYSIS

Not required by the CAR.

ACTIONS TO PRECLUDE RECURRENCE

The IDC database programmers will develop a mechanism/routine that will automatically perform a check for each updated or revised Project Office NCR. If there is a disparity in the reportable flag field and the decision by the Certification Manager, then the system will display an error message and force a resolution prior to proceeding.

COMMITMENTS

As a remedial action, provide an email to the involved personnel describing the condition and the appropriate actions to take until the fix to the IDC database is implemented.

DUE DATES

Complete

CAR CONTINUATION SHEET

1. CAR No: 17-039	2. Activity No: A-17-23	3. Page 3 of 3
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As a remedial action, correct the two NCRs in the IDC, which are affected by the CAR condition. *Complete*

Develop and install a database trigger that will display an error message when reporting discrepancies occur. *July 21, 2017*

Provide closure documentation to NWP Quality Assurance. *July 27, 2017*

NWP QA to transmit closure documentation to the CBFO. *August 3, 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.

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 17-039, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 17-039 be approved.

Katie Gentry
Evaluation Performed By: Katie Gentry, CTAC

7-17-17
Date