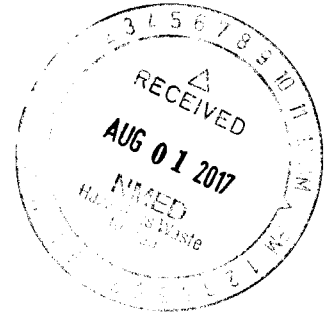




 **ENTERED**

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
AUG 01 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 Corrective Actions for CAR 17-037 from
Audit A-17-17, Los Alamos National Laboratory Recertification Audit

Dear Ms. McDaniel:

The Carlsbad Field Office (CBFO) has completed its review and verification of completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 17-037. 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 have been fulfilled and are satisfactorily implemented. Therefore, the CAR is considered closed.

If you have any questions or comments regarding the CAR closure, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehls
Senior Quality Assurance Specialist

Enclosure



cc: w/enclosure

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
S. Martinez, NWP	ED
D. Huddleston, NWP	ED
E. Harkness, NWP	ED
B. Covert, NWP	ED
J. Britain, NWP	ED
M. Percy, NWP	ED
R. Lee, NWP	ED
R. Reeves, NWP	ED
A.J. Fisher, NWP	ED
B. Pace, NWP	ED
C. Simmons, NWP	ED
J. Harvill, NWP	ED
T. Groover, NWP	ED
T. Mojica, 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. Kieling, NMED	ED
R. Maestas, NMED	ED
D. Biswell, NMED	ED
P. Martinez, CTAC	ED
M. Leroch, CTAC	ED
C. Castillo, CTAC	ED
D. Stegman, 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: 17-037

2. Activity No: A-17-17

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) 17-037, including objective evidence and supporting documentation submitted by Nuclear Waste Partnership LLC (NWP) transmittal letter QA:17:00278 UFC 2300.00 dated July 20, 2017 from Ms. Mary G. McDaniel, Manager, Quality and Contractor Assurance, to Mr. Dennis S. Miehls, 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

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

Verification:

The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. Evidence reviewed included NCR-LANL-0170-17, Rev. 0, closed on 7/10/17, addressed the batch data reports (BDRs) subject to the CAR condition. Additional documentation reviewed included associated nonconformance report (NCR) emails, BDRs LAVE030046 & LAVE030054, and Waste Compliance and Tracking System (WCATS) information. Verified the NCR was included in the BDRs and new signatures were obtained as required.

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.

CAR CONTINUATION SHEET

1. CAR No: 17-037	2. Activity No: A-17-17	3. Page 2 of 3
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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 (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.

Verification:

Investigative actions, including the impact and extent of condition were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:DSM:BA:17-1976:UFC 2300.00.

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 BDRs subject to this CAR condition

Complete

Cancel CCP Standing Order CCP-SO-LANL-70

Complete

Provide closure documentation to NWP Quality Assurance

Complete

NWP QA, transmit closure documentation to CBFO

Complete

CAR CONTINUATION SHEET

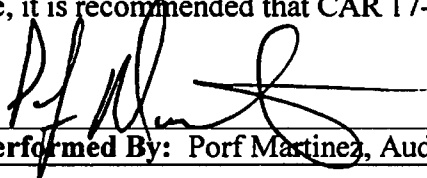
1. CAR No: 17-037	2. Activity No: A-17-17	3. Page 3 of 3
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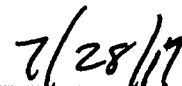
Verification:

Verified actions to preclude recurrence are acceptable through review of supporting documentation submitted in the CAR 17-037 closure package. The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. Evidence reviewed included NCR-LANL-0170-17, Rev. 0, closed on 7/10/17, addressed the BDRs subject to the CAR condition. Additional documentation reviewed included associated NCR emails, BDRs LAVE030046 & LAVE030054, and WCATS information. Verified the NCR was included in the BDRs and new signatures were obtained as required. Verified Central Characterization Program (CCP) Standing Order CCP-SO-LANL-70 Rev. 0 was cancelled on 6/8/17.

CLOSURE ACCEPTANCE

Based on the results of the review and verification of the objective evidence included in the CAR 17-037 closure package, it is recommended that CAR 17-037 be closed.


Verification Performed By: Porf Martinez, Auditor


Date