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Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
AUG 02 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 17-013 from Audit
A-17-05, NWP Industrial Safety Air Quality Monitoring Audit, conducted January 24 -
26, 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) 17-013, which resulted from Audit A-17-05. 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

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

- E. Garza, CBFO *ED
M. Brown, CBFO ED
R. Elmore, CBFO ED
D. Miehl, CBFO ED
M. Stapleton, CBFO ED
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M. Heard, CBFO ED
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J. Ellis, NWP ED
J. Walsh, EPA ED
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Block #16 & 17 Acceptance of Corrective Actions Completion and Closure:

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 17-013, including objective evidence and supporting documentation submitted by Nuclear Waste Partnership LLC (NWP) transmittal letter QA:17:00281 UFC 2300.00 dated July 20, 2017 from Ms. Mary G. McDaniel, Manager, Quality Assurance, to Mr. Martin Navarrete, Senior Quality Assurance Specialist, CBFO Office of Quality Assurance.

Italicized text, taken verbatim from the amended 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:

- *Add applicable reference numbers for updated Electronic Forms for Personal Sampling and Area Air Sampling to WP 12-IH1006.*
- *Conduct a briefing or required reading with the IS/IH group on IH procedures and associated forms to assure controlled forms are used for all data and records required by the following procedures:*
 - *12-IH.02-1, WIPP IH Program – Health Hazard Assessment*
 - *12-IH.02-18, WIPP IH Program – Indoor Air Quality*
 - *12-IH.02-4, WIPP IH Program – Hazard Communication Program*
 - *12-IH.02-6, WIPP IH Program – Respiratory Protection 12-IH1004, Noise Surveys*
 - *12-IH1006, Airborne Contaminant Sampling*
 - *12-IH1022, Sampling for Waste Generated VOCs*
 - *12-IH1200, Heat Stress*
 - *12-IH1300, Confined Space Entry*

Verification:

The objective evidence submitted in this closure package was reviewed to meet the required remedial actions commitment. The objective evidence submitted showed the removal of one form and creation of five additional forms to support procedure WP 12-IH1006. In addition, an Industrial Hygiene (IH) Briefing was conducted with the IH group regarding the requirements in WP 13-1, NWP Quality Assurance Program Description regarding Section 1.4.1 document requirements. Refer to closure package documentation.

Investigative Actions:

Review WP 12-IH1006, Airborne Contaminant Sampling

- *WP 12-IH1006 was reviewed. It was determined that the procedure lacked the references for appropriate forms.*
- *It was determined that as the IH program complexity and staffing levels evolved, various user-created forms were used to informally collect field information. This information was then transferred into a department database for storage and retrieval. The need for controlling the forms was not recognized.*

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- *Information from the field note forms was transferred to a department database; no records were lost in the process, although the data collection forms lacked formality and document control.*
- *Other IH procedures were reviewed, including 12-IH.02-1, WIPP IH Program – Health Hazard Assessment, 12-IH.02-18, WIPP IH Program – Indoor Air Quality, 12-IH.02-4, WIPP IH Program – Hazard Communication Program, 12-IH.02-6, WIPP IH Program – Respiratory Protection, 12-IH1004, Noise Surveys and 12-IH1022, Sampling for Waste Generated VOCs to assure controlled forms are used for all data and records. No other discrepancies were determined.*

Verification:

Investigative actions and extent of condition were evaluated and found to be acceptable, as documented in amended CBFO CAP acceptance memorandum CBFO:OQA:MPN:BA:17-1920:UFC 2300.00. Although not required per the CAP, NWP ISIH conducted an internal audit of forms related to record-keeping and did not identify any extent of conditions identified in the investigative actions.

Causal Analysis

Apparent Cause A4B1C04

Management follow-up or monitoring of activities did not identify problems

Verification:

Although Causal Analysis was not required, NWP conducted Management Observations as part of the commitments – MO Numbers: 07-19-17-01 and 07-14-17-03. These management assessments indicate that record-keeping practices are improving.

Action(s) to Preclude Recurrence:

- *Conduct a briefing or required reading with the IS/IH group on IH procedures to assure controlled forms are used for all data and records.*
- *Add references to controlled Electronic Forms for Personal Air Sampling and Area Air Sampling to WP 12-IH1006.*

Commitments

Due Dates

Review other IH Procedures to assure controlled forms are used for all data and records

Complete

Conduct a briefing or required reading with the IS/IH group on IH procedures to assure controlled forms are used for all data and records.

Complete

Add references to Controlled Electronic Forms for Personal Air Sampling and Area Air Sampling to WP 12-IH1006.

Complete

Perform a Management Observation in 1 month to assure use of controlled forms.

Complete

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Provide closure documentation to NWP Quality Assurance.

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. In addition, procedures WP 12-IH1006 and WP 12-IH1022 were reviewed to verify actions associated with CAR 17-013. The objective evidence includes:

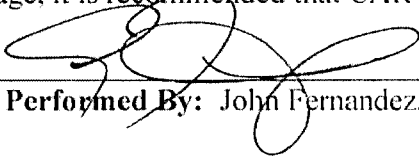
- (1) 2 – Management Observations
 - a. MO Number: 07-14-17-03
 - b. MO Number: 07-19-17-01
- (2) Email showing the removal of EAIH1022-4-0 and replaced with a revision to EAIH1022-3-0. EAIH1022-4-0 was not being used at the time of the audit, infrequently when needed and verified this through interviews with IH staff.
- (3) Email regarding internal audit conducted by IH department of IH recordkeeping related to procedures WP 12-IH1007, *Personal Sample Pump Calibration* and WP 12-IH1022, *Volatile Organic Compound (VOC) Monitoring*. Results are in the email of this internal audit.
- (4) IH Briefing – Items discussed:
 - a. WP 13-1, NWP QAPD, Rev. 36, Section 1.4.1
 - b. Signed attendance table
 - c. CBFO Assessment A-17-5
 - i. Ref# 17-013 CAQ
 - ii. CTS# 428975
 - d. The additional forms that were created to replace the “field notes” for IH Sampling and Monitoring
- (5) Examples of the new additional Electronic Attachment (EA) forms for WP 12-IH1006:
 - a. EA12IH1006-1-0, Industrial Hygiene Chemical Sampling Datalog Sheet
 - b. EA12IH1006-2-0, Passivated Canister Chain of Custody and Field Data Record
 - c. EA12IH1006-3-0, Laboratory Analytical Request Form
 - d. EA12IH1006-4-0, Authorization for Radioactive Sample Receipt
 - e. EA12IH1006-5-0, Client Notification of Sample Radioactivity
- (6) Copy of WP 12-IH1006, Rev. 6, *Airborne Containment Sampling*, with highlighted references to changes made based on the Condition Adverse to Quality (CAQ) identified in CAR 17-013 during A-17-05. A major rewrite occurred with the latest revision.

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Conclusion:

Based on the results of the review and verification of the objective evidence included in the CAR 17-013 closure package, it is recommended that CAR 17-013 be closed.



Verification Performed By: John Fernandez, CTAC

8-1-17

Date