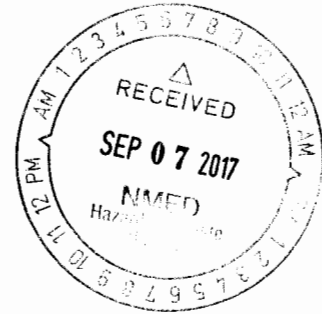




ENTERED

Department of Energy  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
SEP 07 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 17-015 from Audit A-17-05, Nuclear Waste Partnership LLC Industrial Safety Air Quality Monitoring Audit, conducted January 24 – 26, 2017

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) 17-015. 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) 234-7483.

Sincerely,

Martin P. Navarrete  
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

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

\*ED denotes electronic distribution



### CAR CONTINUATION SHEET

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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) 17-015, including objective evidence and supporting documentation submitted by Nuclear Waste Partnership LLC (NWP) transmittal letter QA:17:00313 UFC 2300.00 dated August 16, 2017 from Ms. Mary G. McDaniel, Manager, Quality and Contractor 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:**

- *Provide a clear statement in WP 12-IH1007, Personal Sampling Pump Calibration, and WP 12-IH1828, MSHA Air Quality Monitoring, whether IH equipment requires MSHA approval labels or logos.*

**Verification:**

The objective evidence submitted in this closure package was reviewed to meet the required remedial actions commitment. The objective evidence submitted showed the revision to procedure WP 12-IH1007 including two sentences that state, "Pumps may or may not have NIOSH or Mine Safety and Health Administration (MSHA) approval labels present. Approval labels are not required for sampling equipment in non-gassy mines."

**Investigative Actions:**

- *During the investigation, it was determined that air pumps are specifically referenced in MSHA Metal/Nonmetal Health Inspection Procedures Handbook PH06-IV-1, chapter 4. Also, 30 CFR part 56, 57, 58 were reviewed for further guidance and it was determined that it is not a requirement for air sample pumps used in Metal/Non-metal mines to have MSHA approval stickers.*
- *The Condition Adverse to Quality (CAQ) was determined to be inaccurate instructions/requirements. Although there is no regulatory requirement for the Gillian pumps to bear the MSHA approval label, this requirement is not clearly stated in the IH program documents*
- *A rapid expansion in the IH sampling and monitoring capabilities throughout 2016 caused the CAQ to occur. There is no impact to the overall IH department due to equipment designations or labeling*

**Verification:**

Investigative actions were found to be acceptable, as documented in amended CBFO CAP acceptance memorandum CBFO:OQA:MPN:BA:17-1920:UFC 2300.00.

**CAR CONTINUATION SHEET**

<b>1. CAR No:</b> 17-015	<b>2. Activity No:</b> A-17-05	<b>3. Page 2 of 3</b>
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***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 a Management Observation as part of the commitments – MO Number: 07-17-17-JHC. The management observation indicated a focus area of MSHA labeling of IH Instruments.

***Action(s) to Preclude Recurrence:***

- Procedural guidance or a definition will be added to WP 12-IH1007, Personal Sampling Pump Calibration, and WP 12-IH1828, MSHA Air Quality Monitoring, that clearly specifies which sampling and monitoring equipment is required to bear the MSHA approval label.*

***Commitments***

*Provide guidance in WP 12-IH1007, Personal Sampling Pump Calibration, and WP 12-IH1828, MSHA Air Quality Monitoring, stating the requirements for MSHA labels on the IH AIR PUMP sampling equipment.*

***Due Dates***

*Complete*

*Provide a Management Assessment to assure that instruments are labeled in accordance with WP 12-IH1007, Personal Sampling Pump Calibration, and WP 12-IH1828, MSHA Air Quality Monitoring.*

*Complete*

*Provide closure documentation to NWP Quality Assurance (QA).*

*Complete*

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

*Complete*

**Verification:**

Verified actions to preclude recurrence are acceptable through review of supporting documentation submitted in the CAR 17-015 closure package. The reviewed documentation included:

- (1) Revised procedures: WP 12-IH1007 Revision 5 and WP 12-IH1828 Revision 9
- (2) Management Observation 07-17-17-JHC
- (3) Email from NWP Industrial Hygiene Operations Manager to Distribution dated 7-17-17 titled "Do All IH Instruments Need the MSHA Certification Label?" with attachment "Position Paper – IH Instrumentation Needing MSHA Certification.pdf"
- (4) Position Paper: What IH Instruments Need MSHA Certification dated July 17<sup>th</sup>, 2017

### CAR CONTINUATION SHEET

1. CAR No: 17-015	2. Activity No: A-17-05	3. Page 3 of 3
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**CLOSURE ACCEPTANCE:**

Based on the results of the review of the objective evidence included in the CAR 17-015 closure package, it is recommended that CAR 17-015 be closed.

  
Verification Performed By: John Fernandez, CTAC

9-5-17

Date