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**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 Rejection of Completion Documentation of Corrective Actions for CAR 17-014 from Audit A-17-05, Nuclear Waste Partnership LLC 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) 17-014, 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 are rejected.

The verification concluded that the associated corrective actions are rejected due to the missing reference of SAF-101 in procedure WP 12-IH1007, Personal Sampling Pump Calibration. The CAR is considered open and not closed until all of the accepted Corrective Action Plan (CAP) commitments are completed. The new expected completion date to submit closure documentation is September 22, 2017.

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

Ms. Mary McDaniel

-2-

SEP 07 2017

cc: w/enclosure

J. Carswell, CBFO	*ED
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M. Brown, CBFO	ED
R. Elmore, CBFO	ED
D. Miehl, CBFO	ED
M. Stapleton, CBFO	ED
M. Fineran, CBFO	ED
M. Heard, CBFO	ED
J. Britain, NWP	ED
B. P. Shagula, NWP	ED
V. Ballew, NWP	ED
S. Saiz, NWP	ED
A. Boyea, NWP	ED
J. Ellis, NWP	ED
J. Walsh, EPA	ED
T. Peake, EPA	ED
J. Kieling, NMED	ED
R. Maestas, NMED	ED
D. Biswell, NMED	ED
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\*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) 17-014, including objective evidence and supporting documentation submitted by Nuclear Waste Partnership LLC (NWP) transmittal letter QA:17:00312 UFC 2300.00 dated August 16, 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:**

- *Each IH procedure will be assigned to a Point of Contact and a Subject Matter Expert. The IH procedures to be assigned POCs and SMEs are:*
  - *12-IH.01, WIPP CHEMICAL HYGIENE PLAN*
  - *12-IH.02, WIPP INDUSTRIAL HYGIENE PROGRAM MANUAL*
  - *12-IH.02-1, WIPP IH PROGRAM – HEALTH HAZARD ASSESSMENT*
  - *12-IH.02-10, WIPP IH PROGRAM – INORGANIC LEAD MANAGEMENT PROGRAM*
  - *12-IH.02-11, WIPP IH PROGRAM – POLYCHLORINATED BIPHENYLS (PCBS)*
  - *12-IH.02-12, WIPP INDUSTRIAL HYGIENE PROGRAM – CRYOGENICS, ...*
  - *12-IH.02-13, INDUSTRIAL HYGIENE PROGRAM – APPROVED PLASTIC SUIT, AIRLINE*
  - *12-IH.02-14, INDUSTRIAL HYGIENE PROGRAM – APPROVED PLASTIC HOOD, AIRLINE*
  - *12-IH.02-15, INDUSTRIAL HYGIENE PROGRAM – HEAT STRESS*
  - *12-IH.02-16, INDUSTRIAL HYGIENE PROGRAM – ASBESTOS MANAGEMENT*
  - *12-IH.02-18, INDUSTRIAL HYGIENE PROGRAM – INDOOR AIR QUALITY*
  - *12-IH.02-2, WIPP IH PROGRAM – CONFINED SPACES*
  - *12-IH.02-3, WIPP IH PROGRAM – HAZARDOUS WASTE OPERATIONS AND EMERGENCY ...*
  - *12-IH.02-4, WIPP IH PROGRAM – HAZARD COMMUNICATION AND HAZARDOUS ...*
  - *12-IH.02-5, WIPP IH PROGRAM – HEARING CONSERVATION*
  - *12-IH.02-6, WIPP IH PROGRAM – RESPIRATORY PROTECTION*
  - *12-IH.02-7, WIPP IH PROGRAM – LASERS, LIGHTING, PEST CONTROL, SANITATION*
  - *12-IH.02-8, WIPP IH PROGRAM – OFFICE AND INDUSTRIAL ERGONOMICS*
  - *12-IH.02-9, WIPP IH PROGRAM – BERYLLIUM EXPOSURE PREVENTION PROGRAM*
  - *12-IH1004, NOISE SURVEYS*
  - *12-IH1006, AIRBORNE CONTAMINANT SAMPLING*
  - *12-IH1007, PERSONAL SAMPLING PUMP CALIBRATION*
  - *12-IH1008, INDOOR AIR QUALITY EVALUATIONS AND RESPONSE*
  - *12-IH1020, ABNORMAL CONDITION INVOLVING CRYOGENICS/INERT GAS*
  - *12-IH1200, HEAT STRESS*

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- 12-IH1202, MAINTAINING PAPRS FOR USE
- 12-IH1815, LOCAL EXHAUST ANNUAL FACE VELOCITY TESTING
- 12-IH1828, MSHA AIR QUALITY MONITORING
- 12-IS1005, RESPIRATOR/FACEPIECE CLEANING AND INSPECTION
- 12-IS1810, QUANTITATIVE FIT TESTING
- *Revise WP 12-IH1006 to state the personnel qualification requirements to perform IH work.*
- *Revise WP 12-IH1007 to:*
  1. *Reference SAF-101*
  2. *Evaluate forms associated with WP 12-IH1007 and add, subtract or revise as necessary.*
  3. *Accurately state the requirements for record generation.*
  4. *State the personnel qualification requirements to perform IH work.*

#### **Verification:**

The objective evidence submitted in this closure package was reviewed to meet all but one required remedial action commitment. The objective evidence showed through the use of a table, the Industrial Hygiene's (IH) Points of Contact (POC) and Subject Matter Experts (SME) for each IH procedure in use and is deemed acceptable. But in the Remedial Actions section, a reference to SAF-101 guide for calibrating was mentioned, accepted through the CAP process and yet no mention of this guide or its use is listed in procedure WP 12-IH1007. If submitted and accepted through the CAP process, then the reference to SAF-101 should be listed as stated in the accepted CAP. Therefore, remedial actions are rejected.

#### **Investigative Actions:**

*WP 12-IH1006, WP 12-IH1007, and WP 12-IH1022 were reviewed to determine the clarity of personnel qualifications. It was determined that 12-IH1006, 12-IH1007, 12-IH1022 require revision to state, "personnel are qualified to perform work through the WIPP training and qualification program," or similar language.*

- *WP12-IH1006, Airborne Contaminant Sampling, WP 12-IH1007, Personal Sampling Pump Calibration, and WP 12-IH1022, Sampling for Waste Generated VOCs, were reviewed for adequacy, correctness and completeness. It was determined that certain IH practices had evolved that were incompletely captured in the various procedures.*
- *A rapid expansion of the IH department scope and role caused IH to rely on skills that are standard throughout the trade, rather than detailed procedures. This practice caused the Condition Adverse to Quality (CAQ) to happen.*
- *As the auditors themselves stated, "Personnel are qualified to perform work through the WIPP training and qualification program." This program assures that IH technical representatives possess the appropriate skills to perform their jobs effectively. There are no adverse effects to the overall department program due to these minor procedural discrepancies and incomplete reference source lists.*
- *Other department procedures were reviewed. No further discrepancies were noted.*

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**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. Additional statements were added to both WP 12-IH1006 and WP 12-IH1007, which states, "This procedure is to be performed only by qualified individuals." This statement is an accurate representation of the actual steps in the procedure for the Industrial Hygiene department versus the previous statement of "designated by the IS/IH Manager."

***Causal Analysis:***

*Apparent Cause A4B1C04*

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

**Verification:**

A causal analysis was not deemed necessary for this CAR although one was provided.

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

*Each IH procedure will be assigned to a Point of Contact and a Subject Matter Expert. This requirement will be reinforced in the IS/IH group via a documented briefing or required reading.*

***Commitments***

*Each IH procedure will be assigned to a Point of Contact and a Subject Matter Expert.*

***Due Dates***

***Complete***

*Revise WP 12-IH1006 to state the personnel qualification requirements to perform IH work.*

***Complete***

*Revise WP 12-IH1007 to:*

***6/16/17 \****

- Reference SAF-101*
- Evaluate forms associated with WP 12-IH1007 and add, subtract or revise as necessary.*
- Accurately state the requirements for record generation*
- State the personnel qualification requirements to perform IH work*

*Provide a Management Observation on WP 12-IH1007 and WP 12-IH1022 to assure that records are properly handled and maintained in accordance with those procedures.*

***Complete***

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

***Complete***

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

***Complete***

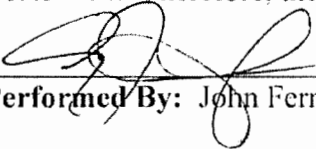
### CAR CONTINUATION SHEET

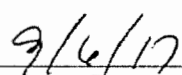
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\*First bullet point reference, SAF-101, is not included in procedure.

**Verification:**

In the remedial actions and actions to preclude recurrence section under commitments, a reference to SAF-101 was part of the accepted amended CAP for closure, and was not included into the latest revision of WP 12-IH1007. The objective evidence submitted in the closure was reviewed and verified to meet the investigative actions and extent of conditions but not remedial or actions to preclude due to the exclusion of the referenced SAF-101. Therefore, the closure package documentation is rejected.

  
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Verification Performed By: John Fernandez, CTAC

  
\_\_\_\_\_  
Date