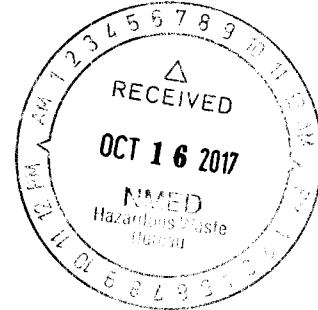


Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
 OCT 16 2017

ENTERED



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 17-048 Resulting from CBFO Audit A-17-25

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) 17-048. As documented on the enclosed CAR Continuation Sheet, the evaluation indicates that the CAP is acceptable.

If you have any questions or comments concerning the evaluation, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

J. Carswell, CBFO	*ED	S. Saiz, NWP	ED
M. Brown, CBFO	ED	A. Boyea, NWP	ED
J.R. Stroble, CBFO	ED	T. Peake, EPA	ED
D. Miehl, CBFO	ED	E. Felcorn, EPA	ED
M. Stapleton, CBFO	ED	R. Joglekar, EPA	ED
M. Fineran, CBFO	ED	J. Kieling, NMED	ED
G. Birge, CBFO	ED	D. Biswell, NMED	ED
N. Castaneda, CBFO	ED	A.J. Fisher, S1C	ED
T. Carver, CBFO	ED	T. Runyon, CTAC	ED
D. Misch, DOE-CH	ED	P. Martinez, CTAC	ED
K. Joshi, DOE-CH	ED	C. Castillo, CTAC	ED
J. Britain, NWP	ED	M. Leroch, CTAC	ED
M. Percy, NWP	ED	J. Oliver, CTAC	ED
R. Lee, NWP	ED	K. Gentry, CTAC	ED
C. Simmons, NWP	ED	P. Hinojos, CTAC	ED
B. Pace, NWP	ED	G. White, CTAC	ED
J. Harvill, NWP	ED	CBFO QA File	
J. Carter, NWP	ED	CBFO M&RC	
V. Ballew, NWP	ED	*ED denotes electronic distribution	



CAR CONTINUATION SHEET

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Block #16 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) 17-048. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:17:00355 UFC:2300.00, dated September 26, 2017, from Ms. M. G. McDaniel, Manager, NWP Quality and Contractor Assurance, to Mr. M. P. Navarrete, 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

CCP has taken the following remedial action in response to the CAR condition:

- 1. CCP has issued non-conformance report (NCR) NCR-RHANL-0497-17 on August 16, 2017 to control the condition identified in the CAR as well as the affected radiological characterization report #ANLE-RH-50-92.*
- 2. An email from the RH Project Manager will be sent to the Radiological Engineers directing them to only utilize VE BDR data obtained from CCP records for performing radiological characterization until a Standing Order to this affect is implemented.*

Evaluation:

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

INVESTIGATIVE ACTIONS

An investigation in the circumstances regarding this CAR condition revealed that contrary to the requirements in CCP-TP-513, which is to acquire VE BDR data in order to perform radiological characterization, the radiological engineers used incomplete information provided in an email dated March 2016 from the Remote-Handled (RH) project manager who is no longer employed in the CCP program. This incomplete information was then used to perform the radiological characterization. The method of obtaining the information and its use led to the errant results presented within the calculation package and is considered the direct cause for the condition in the CAR.

Extent of Condition

The extent-of-condition included a review of ninety-eight (98) historical Waste Container Radiological Characterization Records (radiological reports/calculation packages) generated between October 2010 to October 2016. This review concluded that the condition was isolated to the calculation package identified within the CAR (ANLE-RH-50-92). This process described in CCP-TP-513 is only used by CCP at ANL; therefore, no other host-site processes are affected by the condition.

Impact-of-the-Condition

In this particular instance, the impact of the condition was determined to be negligible since the condition, had it gone undetected, would have only resulted in an under-reporting of radiological characterization

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values, which would not have resulted in a violation of any regulatory or shipping limit requirements. Furthermore, only one calculation package (ANLE-RH-50-2) was affected.

Evaluation:

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

CAUSAL ANALYSIS

Not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

Initiate a Standing Order requiring Radiological Engineers to only obtain VE Batch Data Reports from CCP Records in order to perform Radiological Characterization and revise CCP-TP-513 to incorporate the requirement established by the Standing Order.

COMMITMENTS

DUE DATES

Initiate NCR-RHANL-0497-17 to control and correct the error in the radiological characterization report.

Complete

RH Project manager send an email to all radiological engineers instructing that only Visual Examination BDR data obtained from CCP records are to be used for performing radiological characterization.

September 22, 2017

Initiate a Standing Order Requiring that Visual Examination Batch Data Reports be obtained from CCP Records in order to perform radiological characterization.

October 12, 2017

Revise CCP-TP-513 to incorporate requirements in the Standing Order that VE Batch Data Reports be obtained from CCP Records in order to perform radiological characterization.

January 19, 2018

Provide Closure documentation to NWP Quality Assurance.

January 24, 2018

NWP QA, transmit closure documentation to CBFO

January 26, 2018

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.

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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 17-048, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 17-048 be approved.

James B. Oliver
Evaluation Performed By: James Oliver, CTAC

10/12/2017
Date