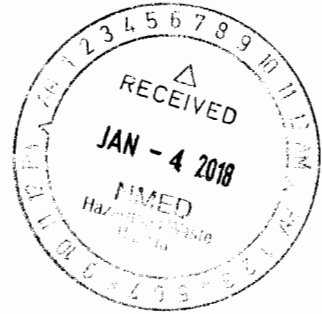


 **ENTERED**



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
JAN 04 2018



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 Completion Documentation of Corrective Actions for CAR 17-014 from Audit A-17-05, NWP Industrial Safety Air Quality Monitoring, conducted January 24 – 26, 2017

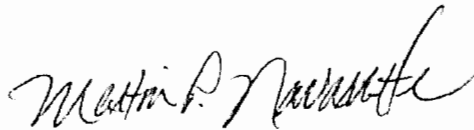
Dear Ms. McDaniel:

Enclosed are the results of the Carlsbad Field Office (CBFO) 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 is acceptable.

The verification concluded that the associated corrective actions are accepted due to the addition of the reference of SAF-101 training in procedure WP 12-IH1007, *Personal Sampling Pump Calibration*, and in conjunction with the previously reviewed submitted objective evidence. 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



Ms. Mary McDaniel

-2-

JAN 04 2018

cc: w/enclosure

J. Carswell, CBFO	*ED
E. Garza, CBFO	ED
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, EPA	ED
J. Walsh, EPA	ED
T. Peake, EPA	ED
J. Kieling, NMED	ED
R. Maestas, NMED	ED
D. Biswell, NMED	ED
H. Tellez, NMED	ED
T. Runyon, CTAC	ED
P. Martinez, CTAC	ED
C. Castillo, CTAC	ED
M. Lerach, CTAC	ED
P. Yanez, CTAC	ED
J. Vernon, CTAC	ED
J. Fernandez, CTAC	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 17-014	2. Activity No: A-17-05	3. Page 1 of 4
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Block #17 & #18 Acceptance of Corrective Actions Completion and Closure:

The Carlsbad Field Office (CBFO) has reviewed the closure packages for Corrective Action Report (CAR) 17-014, including objective evidence and supporting documentation submitted by Nuclear Waste Partnership LLC (NWP) transmittal letters QA:17:00312 UFC 2300.00 dated August 16, 2017 and QA:17:00438 UFC 2300.00 dated December 19, 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*

CAR CONTINUATION SHEET

1. CAR No: 17-014

2. Activity No: A-17-05

3. Page 2 of 4

- 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 the first closure package was reviewed and found to meet all but one required remedial action commitment. A table was created to show points of contact (POCs) and subject matter experts (SMEs) for each Industrial Hygiene (IH) procedure in use and was deemed acceptable. Remedial actions in the CAP referenced SAF-101 training for calibrating, which was accepted through the CAP process; however, this training was not mentioned in procedure WP 12-IH1007. The SAF-101 training was added to the latest revision of WP 12-IH1007 (Rev. 7). Therefore, the remedial actions are acceptable.

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 revisions 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.*

CAR CONTINUATION SHEET

1. CAR No: 17-014	2. Activity No: A-17-05	3. Page 3 of 4
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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. WP 12-IH1006 had the statement, "This procedure is to be performed only by qualified individuals," added to the procedure. 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." In WP 12-IH1007, a similar statement was added plus the addition of the following words, "..., as evidenced by completion of SAF-101-TC, *Personal Sample Pump Calibration.*"

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:

Complete*

- *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

1. CAR No: 17-014	2. Activity No: A-17-05	3. Page 4 of 4
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*First bullet point reference, SAF-101, was added to procedure WP 12-IH1007 to complete the originally agreed commitments per the approved CAP. This commitment was missing from the previously submitted objective evidence.

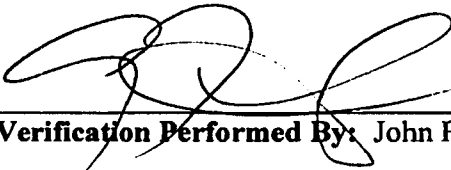
Verification:

The objective evidence submitted in the closure packages was reviewed and verified to meet the remedial actions, investigative actions, extent of conditions, and actions to preclude recurrence. The objective evidence includes:

- (1) Industrial Health briefing with NWP IH personnel July 13th – 17th, 2017, discussing new matrix for responsible Point of Contacts (POCs) and Subject Matter Experts (SMEs) for IH programs and procedures.
- (2) NWP IH Program – Points of Contact and Subject Matter Experts matrix
- (3) WP 12-IH1006, Revision 7, *Airborne Contaminant Sampling*
- (4) WP 12-IH1007, Revision 5, *Personal Sample Pump Calibration* (Was the current procedure at the time of the audit, Revision 7 is the latest revision of today's date)
- (5) WP 12-IH1007, Revision 7, *Personal Sample Pump Calibration* (Current revision and showing the addition of the SAF-101 training)
- (6) 1 - Management Observation
 - a. MO Number: 07-14-17-JHC
- (7) Email regarding internal audit of Industrial Health recordkeeping related to procedures WP12-IH1007, *Personal Sample Pump Calibration*, and WP12-1022, *VOC Monitoring*

Conclusion:

Based on the results of the review of the objective evidence included in both CAR 17-014 closure packages, it is recommended that CAR 17-014 be closed.


Verification Performed By: John Fernandez, CTAC

1/2/18
Date