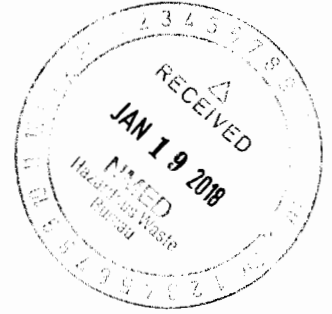


ENTERED



**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
JAN 19 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 Corrective Actions for CAR 18-001 from the Savannah River Site Central Characterization Program Recertification Audit A-18-02

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) 18-001, which resulted from Audit A-18-02. 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) 234-7491.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. Miehl".

Dennis S. Miehl  
Senior Quality Assurance Specialist

Enclosure



Ms. Mary McDaniel

-2-

JAN 19 2018

cc: w/enclosure

R. Murray, EM-3.113	*ED
J. Carswell, CBFO	ED
M. Brown, CBFO	ED
J.R. Stroble, CBFO	ED
M. Navarrete, CBFO	ED
M. Stapleton, CBFO	ED
M. Fineran, CBFO	ED
N. Castaneda, CBFO	ED
T. Carver, CBFO	ED
J. Craig, DOE-SR	ED
D. Ferguson, DOE-SR	ED
J. Britain, NWP	ED
M. Percy, NWP	ED
R. Lee, NWP	ED
B. Pace, NWP	ED
J. Harvill, NWP	ED
J. Carter, NWP	ED
V. Ballew, NWP	ED
S. Saiz, NWP	ED
A. Boyea, NWP	ED
A.J. Fisher, SC1	ED
J. Walsh, EPA	ED
J. Ellis, EPA	ED
T. Peake, EPA	ED
E. Feltcom, EPA	ED
R. Joglekar, EPA	ED
J. Kieling, NMED	ED
R. Maestas, NMED	ED
D. Biswell, NMED	ED
H. Tellez, NMED	ED
M. McLean, NMED	ED
T. Runyon, CTAC	ED
P. Martinez, CTAC	ED
M. Leroy, CTAC	ED
C. Castillo, CTAC	ED
R. Chavez, CTAC	ED
P. Yanez, CTAC	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED
Site Documents	ED
CBFO QA File	
CBFO M&RC	

\*ED denotes electronic distribution

### CAR CONTINUATION SHEET

1. CAR No: 18-001	2. Activity No: A-18-02	3. Page 1 of 3
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#### Block 17 & 18 Acceptance of Corrective Action Completion and Closure

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 18-001, including objective evidence and supporting documentation, submitted via Nuclear Waste Partnership LLC (NWP) transmittal letter QA:18:00009 UFC:2300.00 dated January 10, 2018, from Ms. M. G. McDaniel, Manager of Quality and Contractor Assurance, to Mr. D. S. Miehls, Senior Quality Assurance Specialist, CBFO Office of Quality Assurance.

*Italicized text, taken verbatim from the 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

*CCP has taken the following remedial actions in response to the CAR conditions:*

- 1. WF17-693 was initiated upon discovery (7/12/17).*
- 2. Management directed the suspension of submittal to CBFO for all Chemical Compatibility Evaluation Memorandums (CCEMs) affected by the condition.*
- 3. The statement made in error in the WIPP Form that no QA program violation had occurred was discussed with the author, who now understands why the statement was incorrect.*

#### Verification:

The completion of Remedial Action 1 has been verified via review of WIPP Form WF17-693 initiated by Site Project Manager (SPM) D. Wade on July 12, 2017. The completion of Remedial Action 2 has been verified via review of an email from D. Wade (NWP) to B. Pace (NWP) dated November 22, 2017, Subject WF17-693, which describes the verbal direction given by D. Wade to suspend the submittal of CCEMs until the errant reference was corrected. Remedial Action 3 has been verified via review of an email from B. Pace to D. Wade dated November 29, 2017, Subject CBFO CAR 18-001 (Remedial Action #3), which describes the discussion between B. Pace (Issues Management) and D. Wade, the author of WIPP Form WF17-693.

#### INVESTIGATIVE ACTIONS

*The CAR condition describes two related, albeit separate conditions. The first condition deals with an unsigned source document (C104) which was referenced in Chemical Compatibility Evaluation Memorandum (CCEM) designated as "CCE001". This same condition was self-identified by CCP on 7/12/17 and reported in WIPP Form WF17-693. When WF17-693 was screened by the WIPP Form committee, it was concluded that the issue represented a CAQ and assigned to the responsible manager to identify the cause(s) for the issue and take the appropriate corrective actions for resolution. This condition and associated corrective actions are being tracked to resolution in the Issues Management Processing System (IMPS), WIPP Form system.*

### CAR CONTINUATION SHEET

1. CAR No: 18-001

2. Activity No: A-18-02

3. Page 2 of 3

*The second condition notes reference to a statement, made in error, that was included when WF17-693 was initiated which reads in part; "Although no program requirement was violated ... ". The author of the WIPP Form understood that there was no impact on the validity of the CCEMs identified in the WIPP Form. However, the author incorrectly concluded that, since there was no impact from the reported issue, no program requirement had been violated. Clearly, there are situations where a condition may have no technical impact, however it could still represent a violation of a program requirement. The issue identified in WIPP Form 17-693 is one such condition.*

#### Extent of Condition

*For the first condition noted in the CAR, an investigation revealed that the extent of the condition involves six (6) CCEMs as follows; CCE001/SR-MD-PAD1, CCE10/LA-MIN04-S.001, CCE09LA-MSG04.001, CCE07/LA-MHD04.001, CCE03/LA-CIN01.001, and LAMIN02-V.001. The unsigned source document is cited as C104 in CCE001/SR-MD-PAD1 and C402 in the remaining five (5) CCEMs.*

*For the second condition noted in the CAR, a review of all WIPP Form issues related to CCP within the past two years was performed to determine if other similar instances had occurred where a WIPP Form may have included an errant statement like the one in WF17-693. This review included 140 WIPP Forms, which revealed that there were no other instances similar to the errant statement in WF17-693.*

*As a result, the extent of condition is isolated to the 6 CCEMs noted above.*

#### Impact-of-the-Condition

*For the first condition noted in the CAR, the data and the technical position presented in the affected CCEMs, was then, and remains technically viable. The errant reference to the unsigned source document (CBFO memorandum) did not compromise the technical content or validity of the CCEMs and would not have rendered any related waste containers as noncompliant or unsafe. CBFO has since formally issued the source document in question, which now validates the content of the affected CCEMs.*

#### Verification:

Investigative actions and extent of condition were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:DSM:BA:17-2632:UFC 2300.00.

#### **CAUSAL ANALYSIS**


*Not required for this CAR.*

#### **ACTIONS TO PRECLUDE RECURRENCE**

- 1. Revise CCP-TP-200, Enhanced Acceptable Knowledge Review to require that all source documents referenced in CCEMs are available in CCP Records.*
- 2. Develop and distribute a Lessons Learned describing the condition in WF17-693 and providing guidance on language in WF descriptions regarding compliance decisions.*

**CAR CONTINUATION SHEET**

1. CAR No: 18-001	2. Activity No: A-18-02	3. Page 3 of 3
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<b>COMMITMENTS</b>	<b>DUE DATES</b>
<i>Initiate WF17-693 upon discovery of the errant reference to an unapproved source document in the CCEM.</i>	Complete
<i>Provide direction to suspend all further submittals of CCEMs containing the errant references.</i>	Complete
<i>The errant statement about the issue in the WIPP Form not being a program noncompliance was discussed with the author, to ensure their understanding as to why the statement was incorrect.</i>	Complete
<i>Revise CCP-TP-200 to include direction for the Site Project Manager to ensure all source documents referenced in CCEMs are available in records.</i>	Complete
<i>Submit CBFO letter into CCP records to serve as the approved Source Document referenced as C104 and C402 in the affected CCEMs.</i>	Complete
<i>Develop and distribute a Lessons Learned describing the condition in WF17-693 and providing guidance on language in WF descriptions regarding compliance decisions.</i>	December 28, 2017
<i>Provide closure documentation to NWP Quality Assurance (QA)</i>	January 11, 2018
<i>NWP QA, transmit closure documentation to the CBFO.</i>	January 18, 2018
<b>Verification:</b>	
<p>Verified via review of CCP-TP-200, Revision 3, Step 4.1.1[P], which instructs the SPM to “ensure all source documents referenced in the CCEM are available in CCP Records.” Also verified the submittal of the CBFO letter, referenced as Source Documents C104 and C402, to CCP Records, via the review of the Source Documents provided by CCP Records. Also verified via review of CCP Lessons Learned Number LL-2017-10 dated December 18, 2017, which describes the condition identified in this CAR and WF17-693 and includes a discussion on general WIPP Form quality improvement. All commitments listed in the approved CAP have been verified to be complete.</p>	
<b>ACCEPTANCE</b>	
<p>Based on the results of the review and verification of the objective evidence included in the CAR 18-001 closure package, it is recommended that CAR 18-001 be closed.</p>	
 <hr/> <b>Evaluation Performed By: Ricardo Chavez, CTAC</b>	<hr/> <b>01/17/18</b> <b>Date</b>