



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

JAN 30 2018

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 Proposed CAP for CBFO CAR 18-006

Dear Ms. McDaniel:

The Carlsbad Field Office (CBFO) has evaluated the Corrective Action Plan (CAP) provided to address Corrective Action Report (CAR) 18-006, which resulted from Surveillance S-18-16 of the Advanced Mixed Waste Treatment Project (AMWTP) Enhanced Acceptable Knowledge (AK) process. The surveillance was conducted December 4 – 7, 2017.

The results of the evaluation are provided in the enclosed CAR Continuation Sheets and indicate that the CAP for CAR 18-006 is acceptable. Please submit the CAR closure documentation when complete.

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

Sincerely,

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure

180118



Ms. Mary McDaniel

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JAN 30 2018

cc: w/enclosure

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Site Documents ED
CBFO QA File
CBFO M&RC

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 18-006

2. Activity No: S-18-16

3. Page 1 of 3

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) 18-006. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) transmittal QA:18:00013:UFC 2300.00 dated January 11, 2018, from Ms. Mary McDaniel, Manager, Quality and Contractor Assurance, to Mr. Martin P. Navarrete, Senior Quality Assurance Specialist, CBFO Office of 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:

The WDS Data Administrators (DAs) compiled a list of users assigned to roles in the application that allow editing of data. Those lists were sent to the users' managers to verify that they had the appropriate qualifications and position assignments.

DAs have been instructed not to approve any shipments from AMWTP Waste Streams BN510 and BNINW216. This action will be released when AMWTP has a process in place to properly upload and verify Enhanced AK Information.

Evaluation:

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

INVESTIGATIVE ACTIONS:

Background

The condition resulting in the issuance of CBFO CAR 18-006 was a deficiency in the WDS User's Manual in that it did not identify the training and qualification requirements for each user role in sufficient detail to allow the certification programs to identify what access different positions should have. This is difficult to determine or mandate by WDS as the application is separate and distinct from the certification programs that use it. For example, certification data from AMWTP is entered and submitted by Waste Certification Officials (WCOs), but CCP uses Waste Certification Assistants (WCAs) to enter the data and the WCOs then verify and submit the data for review.

The WDS User's Manual cannot directly specify the position that a user must be qualified for in order to determine the role they are assigned in the application due to the differences in the structure and assignment of positions within each unique certification program. The Certification Program management must determine what qualifications and training are required within their CBFO-certified programs for users to be assigned to specific roles in the WDS. In order for certification program management to make these decisions, sufficient detail and information must be provided in the User's Manual to make those determinations.

Contrary to the description of the Condition Adverse to Quality made in the CAR, there is no requirement for the WDS Data Administrator to provide training to the users. Section 6.10.2.6 item E specifies that the user documentation shall provide a description of any training necessary to use the software, not that training will be provided for the software. This is an important distinction in that the training and qualification requirements for using the WDS cannot be determined by the Data Administrators. Due to the different training structures within the certification programs and the fact that the organizations using the software are separate and distinct from the WDS organization, training cannot be provided by the Data Administrators, but must be provided within the training program of the respective certification program.

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Once again, the information provided by the WDS User's Manual is insufficient to provide the Certification Program the information to ensure and/or develop the appropriate training and qualification.

Investigation

The WDS User's Manual was reviewed with a critical eye towards ensuring that the document provided the information necessary to enable Certification Program management to determine the required training and qualification and subsequently request access to the appropriate roles in the WDS.

It was determined that the WDS User's manual did not provide sufficient information to the Certification Program management for them to determine what training and qualifications their personnel required to assign them to a given WDS role. Specifically, the detail of what data can be modified by each role was deemed insufficient.

Extent of Condition

The WDS User's Manual was also reviewed by the Data Administrators to determine if any other information important to the use of the WDS was insufficient or could be improved. WDS provides an online help system which provides more detailed instructions for each field and function/report in WDS. Although it is described in the WDS User's Manual, its importance as an adjunct to the User's Manual as user documentation is not clearly identified. Additionally, there are methods for entering data by transferring from another system. It was identified that the methods (WDS Web Service and AKTransfer Web Service) are mentioned in the User's Manual, the information necessary to implement a system to communicate with those systems is not included.

During the surveillance in which the Condition Adverse to Quality was identified, another issue was identified related to user roles in WDS. The assessor identified an instance where WDS was requiring that a user uploading Acceptable Knowledge information for containers to have the Shipper/Generator role instead of the Acceptable Knowledge role. The Shipper/Generator role has permission to edit all certification data for a container, rather than the limited editing permission that is required for submission of the AK information.

Impact of Condition

As determined during the Remedial Actions, no users were determined to have permissions or were assigned roles above and beyond what is necessary to perform their duties within the WDS

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.

ACTION(S) TO PRECLUDE RECURRENCE:

The WDS DAs will add additional information in the WDS User's Manual to provide certification program management to determine training and qualification requirements for roles in the WDS User's Manual. The WDS User's Manual will also be modified to provide additional description of the online help and its relationship to the User's Manual as user documentation. This will ensure that the information for determining roles to be requested as well as the training required for candidates for those roles can be determined.

The revision to the WDS User's Manual will also include sections describing and detailing the WDS Web Services for transferring certification/characterization and AK data. This will provide the information necessary for Certification Programs to implement interfaces from their systems to the WDS.

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The WDS AKTransfer web service will be modified to require the AK role rather than the Shipper/Generator role. This will correctly limit the ability of users to modify data to only the data which is actually required.

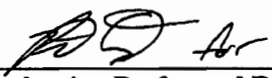
COMMITMENTS	DUE DATES
<i>Verify appropriate qualifications and position assignments for edit roles in WDS with site managers.</i>	<i>Complete</i>
<i>WDS Data Administrators receive and acknowledge direction to not approve shipments for BN 510 and BNINW216 waste streams.</i>	<i>Complete</i>
<i>Revise WDS User's Manual to include additional information for determining training and qualification requirements, further defining online help, and including descriptions and interfaces for the WDS web services</i>	<i>April 10, 2018</i>
<i>Modify the WDS AKTransfer web service to require the AK role rather than the Shipper/Generator role for inserting/updating container AK information</i>	<i>April 10, 2018</i>
<i>Provide closure documentation to NWP Quality Assurance (QA).</i>	<i>April 24, 2018</i>
<i>NWP QA, transmit closure documentation to the CBFO.</i>	<i>May 1, 2018</i>

Evaluation:

The proposed corrective actions are deemed appropriate to address the conditions documented in the CAR and provide reasonable assurance of precluding the likelihood of recurrence.

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 18-006, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 18-006 be accepted.



Evaluation Performed By: Jim Vernon, CTAC

01/25/18

Date