The Carlsbad Field Office (CBFO) has evaluated the Corrective Action Plan (CAP) provided to address Corrective Action Report (CAR) 18-004, 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 18-004 does not provide adequate measures to address the investigative actions and the actions to preclude recurrence. Please revise the CAP for CAR 18-004 and resubmit for review and approval by Friday, February 16, 2018.

If you have any questions concerning this CAR, please contact me at (575) 234-7483.

Martin P. Navarrete
Senior Quality Assurance Specialist

Attachment
cc: w/attachment
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Site Documents ED
CBFO QA File
CBFO M&RC
*ED denotes electronic distribution
An evaluation of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 18-004 has been performed. The CAP was submitted to Mr. Martin Navarrete, CBFO Senior Quality Assurance Specialist, via Department of Energy – Idaho Operations Office transmittal WDP-AMWTP-18-001, dated January 11, 2018, from Mr. James A. Malmo, Assistant Manager, Waste Disposition Project.

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 and INVESTIGATIVE ACTIONS**

The CCE was reviewed for accuracy and completeness. It has been determined that the CCE does not need to be rewritten to remove RGN 107 from Attachment 3 because Technical Assumption 2 addresses RGN 107. Therefore, the inadvertent inclusion of RGN 107 to Attachment 3 did not affect the conclusions of the CCE.

**Extent of Condition:**

The only other CCE for BN510 was evaluated and determined to be valid as is. No other action is required.

**Evaluation:**

The remedial actions described above are deemed appropriate to address the condition adverse to quality identified in the CAR. The investigative actions do not address the actions required to identify the cause of the CAR condition and do not address the reason why Attachment 2 and Attachment 3 are inconsistent.

**ACTION(S) TO PRECLUDE RECURRENTCE**

Revise MCP-4015 to include a note/footnote to include reaction codes GF and H on Attachment 3 for the combination of RGN 10 and RGN 23 on CCEs that contain both RGN 10 and RGN 23.

**Scheduled Completion Date:** 2/28/2018

**Evaluation:**

The action to preclude recurrence does not include any actions to prevent the CAR condition from occurring again. Also, the RGN 10/RGN 23 issue does appear to be pertinent to this CAR.

**ACCEPTANCE**

The results of the evaluation of the CAP indicate that the proposed remedial actions are acceptable, however, the investigative actions and the actions to prevent recurrence do not satisfactorily address the condition adverse to quality documented in CAR 18-004. Therefore, it is recommended that the CAP for CAR 18-004 be rejected.

**Evaluation Performed By:** Randy Fitzgerald, CTAC

**Date:** 2/1/2018