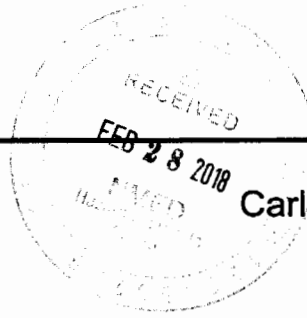


United States Government

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Department of Energy

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**memorandum**Carlsbad Field Office  
Carlsbad, New Mexico 88221DATE: **FEB 28 2018**REPLY TO  
ATTN OF: CBFO:OQA:MPN:18-0986:UFC 2300.00SUBJECT: Evaluation of the Proposed Revised CAP for CBFO CAR 18-007, Resulting from  
Surveillance S-18-16

TO: James A. Malmø, Assistant Manager, Waste Disposition Project, DOE-ID

The Carlsbad Field Office (CBFO) has evaluated the revised Corrective Action Plan (CAP) provided to address the Corrective Action Report (CAR) 18-007, which resulted from Surveillance S-18-16 of the Advanced Mixed Waste Treatment Project Enhanced Acceptable Knowledge process. The surveillance was conducted December 4<sup>th</sup> – 7<sup>th</sup>, 2017.

The results of the evaluation are provided in the attached CAR Continuation Sheets and indicate that the revised CAP for CAR 18-007 does provide adequate measures to address the remedial actions, investigative actions, and actions to preclude recurrence of the condition noted in the CAR. Please submit the CAR closure documentation when complete.

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



Martin P. Navarrete, Acting Director  
Office of Quality Assurance

Attachment



cc: w/attachment

|                      |     |                                     |    |
|----------------------|-----|-------------------------------------|----|
| T. Shrader, CBFO     | *ED | J. Walsh, EPA                       | ED |
| J. Carswell, CBFO    | ED  | J. Ellis, EPA                       | ED |
| J. R. Stroble, CBFO  | ED  | T. Peake, EPA                       | ED |
| D. Miehls, CBFO      | ED  | E. Feltcorn, EPA                    | ED |
| M. Fineran, CBFO     | ED  | R. Joglekar, EPA                    | ED |
| M. Stapleton, CBFO   | ED  | J. Kieling, NMED                    | ED |
| H. Cruickshank, CBFO | ED  | R. Maestas, NMED                    | ED |
| R. Murray, EM-43     | ED  | D. Biswell, NMED                    | ED |
| J. Zimmerman, DOE-ID | ED  | E. Tellez, NMED                     | ED |
| T. Jenkins, DOE-ID   | ED  | M. McLean, NMED                     | ED |
| J. Vliet, DOE-ID     | ED  | T. Runyon, CTAC                     | ED |
| D. Pruitt, DOE-ID    | ED  | P. Martinez, CTAC                   | ED |
| L. Frost, AMWTP      | ED  | M. Leroch, CTAC                     | ED |
| R. Hubler, AMWTP     | ED  | C. Castillo, CTAC                   | ED |
| G. Byram, AMWTP      | ED  | J. Vernon, CTAC                     | ED |
| J. McCoy, AMWTP      | ED  | P. Hinojos, CTAC                    | ED |
| E. Gulbransen, AMWTP | ED  | G. White, CTAC                      | ED |
| E. Dumas, AMWTP      | ED  | Site Documents                      | ED |
| G. Tedford, AMWTP    | ED  | CBFO QA File                        |    |
| A. Morse, AMWTP      | ED  | CBFO M&RC                           |    |
| J. Floerke, AMWTP    | ED  | *ED denotes electronic distribution |    |

**CAR CONTINUATION SHEET**

|                          |                                |                       |
|--------------------------|--------------------------------|-----------------------|
| <b>1. CAR No: 18-007</b> | <b>2. Activity No: S-18-16</b> | <b>3. Page 1 of 2</b> |
|--------------------------|--------------------------------|-----------------------|

**Block 16 Acceptance of Proposed Corrective Actions**

An evaluation was performed of the revised Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 18-007. The revised CAP was submitted via Fluor Idaho transmittal CCN321743 dated February 1, 2018, from Mr. John C. McCoy, Manager, RH/CH Transuranic Waste Program, to Mr. James A. Malmo, Assistant Manager, Waste Disposition Project, U.S. Department of Energy, Idaho Operations Office.

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:**

*Evaluated software provided to the AMWTP. No other software was identified that is not controlled by MCP-3996, Software Quality Assurance. A Class I/II Software Change Request (SCR) 5067, Title: Evaluate AK Assessment spreadsheet upload tool was issued to evaluate and test the Waste Data System (WDS) enhanced Acceptable Knowledge (AK) data upload spreadsheet in accordance with MCP-3996.*

**Evaluation:**

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

**INVESTIGATIVE ACTIONS:**

*The WDS software has historically been controlled by the NWP software configuration program. Our expectation is that the WDS Data Administrators provide acceptable interfaces to their system and that they consult the AMWTP CH-TRU Certification Program on the system requirements and changes so such interfaces can be developed if they do not exist. In this case they did not provide a compliant interface and we didn't recognize that before using the spreadsheet they provided. The changes made to WDS were made to accommodate the CCP processes and in fact CCP was provided with OAKS to facilitate that process. However, OAKS is not compatible with our process and so cannot be used as is. During the development of changes to WDS the AMWTP CH-TRU Certification Program was not consulted nor trained to the changes when published so we could have recognized the issue that there was no compliant interface planned or available.*

**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:**

*To prevent recurrence we have requested that CBFO include us in future WDS developments as noted in letter CCN 321628. Since we do not have direct control of WDS we cannot ensure that the WDS data administrators will follow WIPP software QA requirements in the future and provide acceptable tools for data management. However, a lessons learned will be developed for each WCO and SPM to review any future data interfaces with WDS.*

**Scheduled Completion Date: 02/28/2018**

### CAR CONTINUATION SHEET

|                   |                         |                |
|-------------------|-------------------------|----------------|
| 1. CAR No: 18-007 | 2. Activity No: S-18-16 | 3. Page 2 of 2 |
|-------------------|-------------------------|----------------|

**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.

**ACCEPTANCE**

The results of the evaluation of the revised CAP indicate that the remedial actions, investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 18-007, and do provide adequate measures for precluding recurrence. Therefore, it is recommended that the revised CAP for CAR 18-007 be accepted.

*Cindi Castillo for*

**Evaluation Performed By:** Jim Vernon, CTAC

*2/27/18*

**Date**