DATE: MAY 2 2 2018
REPLY TO ATTN OF: CBFO:OQA:MPN:JM:18-1782:UFC 2300.00
SUBJECT: Verification and Acceptance of Documentation Supporting Completion of the Corrective Actions for CBFO CAR 18-007
TO: James Malmo, Assistant Manager, Waste Disposition Project, DOE-ID

The Carlsbad Field Office (CBFO) has verified the documentation provided by the Waste Disposition Division for Corrective Action Report (CAR) 18-007, which resulted from Surveillance S-18-16 of the Advanced Mixed Waste Treatment Project Enhanced Acceptable Knowledge Implementation. The results of the evaluation are provided in the attached CAR Continuation Sheets.

The results of the evaluation indicate that the corrective actions for CAR 18-007 do provide adequate measures to address the impact/extent and reduce the likelihood of recurrence of the condition noted in the CAR. Therefore, CAR 18-007 is considered closed.

Attachment

cc: w/attachment
T. Shrader, CBFO  * ED
J. Carswell, CBFO  ED
D. Mehls, CBFO  ED
M. Stapleton, CBFO  ED
H. Cruickshank, CBFO  ED
R. Murray, EM-43  ED
J. Zimmerman, DOE-ID  ED
T. Jenkins, DOE-ID  ED
J. Vliet, DOE-ID  ED
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L. Frost, AMWTP  ED
R. Hubler, AMWTP  ED
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J. Kieling, NMED  ED
R. Maestas, NMED  ED
D. Biswell, NMED  ED
E. Tellez, NMED  ED
M. Mclean, NMED  ED
T. Runyon, CTAC  ED
P. Martinez, CTAC  ED
M. Leroch, CTAC  ED
C. Castillo, CTAC  ED
J. Vernon, CTAC  ED
P. Hinojos, CTAC  ED
G. White, CTAC  ED
Site Documents  ED
CBFO QA File  ED
CBFO M&RC  ED
*ED denotes electronic distribution
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) 18-007, including objective evidence and supporting documentation, submitted via Department of Energy – Idaho Operations Office (DOE-ID) letter WDP-AMWTP-18-005, dated May 9, 2018, from Mr. James A. Malmo, Assistant Manager, Waste Disposition Division, to Mr. Martin Navarrete, Acting Director, 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

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.

Verification:
The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. The evidence included the Class I/II Software Change Request (SCR) 5067 titled Evaluate AK Spreadsheet Upload Tool that was approved 1/31/18 (WDP-AMWTP-18-005, Enclosure 5). The evidence also included an update to MCP-3998, Software Inventory Classification, Revision 4, which added AKTransfer.xlms to the AMWTP software inventory (WDP-AMWTP-18-005, Enclosure 6).

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.

Verification:
Investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:MPN:18-0986:UFC 2300.00.

CAUSAL ANALYSIS

Not required for this CAR.
CBFO Form 3.1-2
CBFO MP 3.1, Rev. 15

CAR CONTINUATION SHEET

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

**ACTIONS 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**

**Verification:**
The objective evidence submitted in this closure package was reviewed and verified to meet the required actions to prevent recurrence. The evidence included letter CCN 321628 from John McCoy, Manager, RG/CH Transuranic Waste Programs, Fluor Idaho to J. R. Stroble, Director, Compliance Division, CBFO describing CAR 18-007 and requesting that CBFO include Fluor Idaho personnel in future developments of WDS. The objective evidence also included tailgate training and Lessons Learned given to the AMWTP Waste Certification Officials (WCO’s) and Site Project Managers (SPM’s) (WDP-AMWTP-18-005, Enclosure 7).

**CLOSURE ACCEPTANCE**

Based on the results of the review of the objective evidence included in the CAR 18-007 closure package, it is recommended that CAR 18-007 be closed.

_Cindy Castillo_  
Evaluation Performed By: Jim Vernon, CTAC  
_Date: 5/21/18_