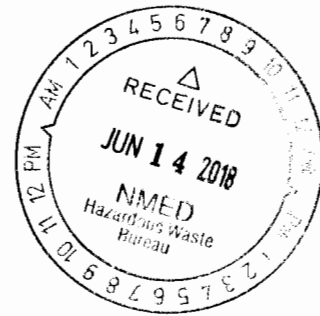




ENTERED

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
JUN 14 2018



Ms. Mary McDaniel, Manager
Quality and Contractor Assurance
Nuclear Waste Partnership LLC
P.O. Box 2078
Carlsbad, NM 88221-2078

Subject: Evaluation and Acceptance of the CAP for CBFO CAR 18-030 Resulting from CBFO Audit A-18-14

Dear Ms. McDaniel:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plan (CAP) associated with Corrective Action Report (CAR) 18-030. As documented on the enclosed CAR Continuation Sheet, the evaluation indicates that the CAP is acceptable.

CBFO will continue to evaluate the progress and sufficiency of the CAP activities prior to formal closure of CAR 18-030.

If you have any questions or comments concerning this evaluation, please contact me at (575) 234-7491.

Sincerely,

[Handwritten signature of Dennis Miehl]

Dennis Miehl
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

- R. Murray, EM-3.113 * ED
T. Shrader, CBFO ED
J. Carswell, CBFO ED
K. Princen, CBFO ED
M. Navarrete, CBFO ED
M. Stapleton, CBFO ED
N. Castañeda, CBFO ED
D. Nickless, EM-LA ED
B. Covert, NWP ED
J. Britain, NWP ED
M. Percy, NWP/CCP ED
R. Lee, NWP/CCP ED
B. Pace, NWP/CCP ED
T. Groover, NWP/CCP ED
J. Carter, NWP/CCP ED
C. Tyler, NWP/QA ED
V. Ballew, NWP/QA ED
S. Saiz, NWP/QA ED
A. Boyea, NWP/QA ED
J. Walsh, EPA ED
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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. Leroch, CTAC ED
C. Castillo, CTAC ED
D. Stegman, CTAC ED
R. Castillo, 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: 18-030	2. Activity No: A-18-14	3. Page 1 of 4
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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) 18-030. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:18:00173:UFC:2300.00, dated June 7, 2018, from Ms. M. G. McDaniel, Manager, NWP Quality and Contractor Assurance, to Mr. D. S. Miehl, Senior Quality Assurance Specialist, CBFO 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

- 1. The LANL Project Manager sent an email on May 21, 2018 to the Lead Operators describing direction and reemphasizing the requirements in CCP-PO-005 for the minimum entries in operational logbooks regarding Acceptable Knowledge verifications.*
- 2. On May 23, 2018, late-entry corrections were entered into the affected logbook to indicate the AK verifications were performed (just not documented with AK identification and revision numbers) and enter the AK identity and version numbers as required by CCP-PO-005.*

Evaluation:

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

INVESTIGATIVE ACTIONS

Background

The changes in CCP-PO-005 to include additional minimum required entries for verifying both AK and software (when applicable) occurred on June 29, 2017 when revision 29 was issued. These changes were made to address two historical conditions adverse to quality identified during CBFO audits of CCP; A-14-03 at the Oak Ridge National Laboratory (ORNL) and A-14-18 at the Idaho National Laboratory (INL), both of which were associated with the use of obsolete versions of AK Summary Reports during Visual Examination and RTR, respectively. These changes required operators to record the AK identification and revision number as well as software identity, revision, Software Change Order and addendums (as applicable) in associated logbooks.

A briefing was conducted with CCP operators and VPMs in June just prior to release of CCP-PO-005, revision 29. This was a comprehensive briefing to communicate to operators and VPMs the types of information to be entered in Operational Logbooks (OLBs), the level of detail, the way the information may be used to reconstruct events, and to provide examples of logbook issues experienced by CCP. The changes imminent in revision 29 were mentioned during the briefing, but only as additional information in the overall comprehensive briefing.

Extent of Condition:

An investigation of all operational logbook entries for all CCP operations since June 29, 2017 was performed. June 29 was the date when Revision 29 of CCP-PO-005, CCP Conduct of Operations was

CAR CONTINUATION SHEET

1. CAR No: 18-030	2. Activity No: A-18-14	3. Page 2 of 4
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issued. The investigation revealed that no other instances existed regarding the lack of recording errors for AK verification in the logbooks. However; the review did reveal a few instances in the logbooks for the LANL high-energy real-time radiography (HERTR) Unit #2, whereby the minimum entries for the associated software were lacking. In these instances, entries were recorded that the software had been verified on the CCP Software Inventory List (SIL); but the required entries for recording the software identity, version, software change order (SCO), etc., were lacking.

The extent of condition also considered a concern voiced; however not documented, during the CBFO audit of the CCP QA Program (A-18-09), which occurred two weeks following the audit at LANL. This concern cited additional instances, similar to the condition in this CAR, whereby AK identity and version numbers and software versions were not recorded in logbook CCP-CH-ORNL-RTR-Unit6-01 and other instances where AK identity and versions were not recorded in logbook CCP-CH-ORNL-NDA-MILCC-01. These instances were reviewed and concluded with the following results:

- 1) Regarding logbook CCP-CH-ORNL-RTR-Unit6-01; the review concluded that on days when AK/software was not recorded, fast-scans were being performed in support of host-site safety-basis purposes (not certified scans); or when routine host-site surveys were performed to detect potential radiological contamination, or when periodic RTR unit maintenance was being performed, and days when there were no containers provided by the host-site. On these days, the required recording for AK and Software would not have been necessary and/or expected.*
- 2) Regarding logbook CCP-CH-ORNL-NDA-MILCC-01, the verification and recording of the AK Summary Report (AKSR) is not required for assay operations because the AKSR is not used by the operators. The review did confirm that software version verifications and recording in the logbook were performed as required.*

As a result, the investigation has concluded that the extent of condition is isolated to the instances described in the CAR and additional instances of software logbook recording errors for the HERTR at LANL.

Impact of Condition:

For the specific conditions identified in the CAR, the AK versions were in fact verified by the operators; however, the versions were not recorded as required by CCP-PO-005 (determined through interview with the affected operators). The additional errors in recording the minimum logbook entries for the verification of associated software related to the HERTR unit at LANL (identified during the extent-of-condition review), were also determined to have been the result of the operator having appropriately verified the software, but did not record the additional required software information specified by CCP-PO-005.

The investigation has concluded that the lack of recording the minimum entries in the logbooks is deemed inconsequential. In all cases, the required verifications had, in fact, been performed; however, not recorded to the detail specified in CCP-PO-005. These conditions posed no negative consequences on characterization operations and resulting data; therefore, the consequences for the conditions are deemed negligible.

CAR CONTINUATION SHEET

1. CAR No: 18-030	2. Activity No: A-18-14	3. Page 3 of 4
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Evaluation:

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

CAUSAL ANALYSIS

Not required by the CAR.

ACTIONS TO PRECLUDE RECURRENCE

The following actions are based on the most likely cause of the condition adverse to quality described in this CAR; failure of VPMs to effectively communicate the details of the changes in CCP-PO-005, revision 29 and inadequate reviews by VPMs to ensure adequacy of logbook entries.

1. *CCP will prepare a lessons learned describing this condition, factors that likely caused this condition, and measures VPMs should take to reduce the likelihood of the condition from recurring in the future.*
2. *CCP will prepare a briefing based on Corrective Action #1 and provide the briefing to all CCP VPMs.*

COMMITMENTS

DUE DATES

The Project Manager at LANL sent an email to the lead operators at LANL on May 21, 2018, reemphasizing the requirements for minimum entries in logbooks required by CCP-PO-005.

Complete

Late entries were made on May 23, 2018 to correct the specific conditions to the affected logbooks identified in the CAR.

Complete

Late entries will be made to correct additional recording errors for software in the affected logbooks for the LANL HERTR UNIT #2. (found during extent of condition investigation)

June 21, 2018

Prepare a lessons learned describing this condition, factors that likely caused this condition, and measures VPMs should take to reduce the likelihood of the condition from recurring in the future.

July 12, 2018

Prepare a briefing based on action above and provide the briefing to all CCP VPMs.

July 12, 2018

Provide closure documentation to NWP Quality Assurance (QA).

July 26, 2018

NWP QA, transmit closure documentation to the CBFO.

August 3, 2018

CAR CONTINUATION SHEET

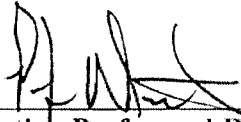
1. CAR No: 18-030	2. Activity No: A-18-14	3. Page 4 of 4
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Evaluation:

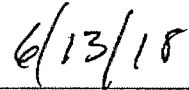
The proposed corrective actions are deemed appropriate to address the condition documented in the CAR and provide reasonable assurance of precluding the likelihood of recurrence.

ACCEPTANCE

The results of the evaluation of the CAP indicate that the remedial actions, investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 18-030, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 18-030 be accepted.



Evaluation Performed By: Porf Martinez, CTAC



Date