



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
JUL 11 2018

ENTERED



Ms. Mary McDaniel, Manager
Quality and Contractor Assurance
Nuclear Waste Partnership LLC
P. O. Box 227B
Carlsbad, NM 88221

Subject: Verification and Acceptance of Corrective Actions for CAR 17-048, Resulting from Audit A-17-25, Argonne National Laboratory Characterization Program Recertification

Dear Ms. McDaniel:

The Carlsbad Field Office (CBFO) has completed its review and verification of completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 17-048. The results of the verification are documented on the enclosed CAR Continuation Sheets and indicate that the documentation of completion of corrective actions is acceptable.

The verification concluded that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 17-048 is considered closed.

If you have any questions or comments regarding the CAR closure, please contact me at (575) 234-7483.

Sincerely,

Martin Navarrete
Senior Quality Assurance Specialist

Enclosure



cc: w/enclosure
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 CBFO QA File
 CBFO M&RC
 *ED denotes electronic distribution

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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) 17-048, including objective evidence and supporting documentation, submitted via Nuclear Waste Partnership LLC (NWP) letter QA:18:00161 UFC:2300.00, dated May 24, 2018, from Ms. Mary G. McDaniel, Manager, NWP Quality and Contractor Assurance, to Mr. Martin P. Navarrete, Senior Quality Assurance Specialist, 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

CCP has taken the following remedial action in response to the CAR condition:

- 1. CCP has issued non-conformance report (NCR) NCR-RHANL-0497-17 on August 16, 2017 to control the condition identified in the CAR as well as the affected radiological characterization report #ANLE-RH-50-92.*
- 2. An email from the RH Project Manager will be sent to the Radiological Engineers directing them to only utilize VE BDR data obtained from CCP records for performing radiological characterization until a Standing Order to this affect is implemented. Included with this email are responses from the Radiological Engineers confirming they understand this direction.*

Verification:

The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. The evidence included NCR-RHANL-0497-17, Rev. 0, dated 8/16/2017. Closure documentation also included an email dated September 18, 2017, from the RH (remote-handled) Project Manager to the Radiological Engineers directing them to use visual examination (VE) batch data report (BDR) data obtained from Central Characterization Program (CCP) Records to perform radiological characterization.

INVESTIGATIVE ACTIONS

An investigation in the circumstances regarding this CAR condition revealed that contrary to the requirements in CCP-TP-513, which is to acquire VE BDR data in order to perform radiological characterization, the radiological engineers used incomplete information provided in an email dated March 2016 from the Remote-Handled (RH) project manager who is no longer employed in the CCP program. This incomplete information was then used to perform the radiological characterization. The method of obtaining the information and its use led to the errant results presented within the calculation package and is considered the direct cause for the condition in the CAR.

Extent of Condition

The extent-of-condition included a review of ninety-eight (98) historical Waste Container Radiological Characterization Records (radiological reports/calculation packages) generated between October 2010 to October 2016. This review concluded that the condition was isolated to the calculation package

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identified within the CAR (ANLE-RH-50-92). This process described in CCP-TP-513 is only used by CCP at ANL; therefore, no other host-site processes are affected by the condition.

Impact-of-the-Condition

In this particular instance, the impact of the condition was determined to be negligible since the condition, had it gone undetected, would have only resulted in an under-reporting of radiological characterization values, which would not have resulted in a violation of any regulatory or shipping limit requirements. Furthermore, only one calculation package (ANLE-RH-50-2) was affected.

Verification:

Investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:MPN:BA:17-2216:UFC 2300.00.

CAUSAL ANALYSIS

Not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

Initiate a Standing Order requiring Radiological Engineers to only obtain VE Batch Data Reports from CCP Records in order to perform Radiological Characterization and revise CCP-TP-513 to incorporate the requirement established by the Standing Order.

COMMITMENTS

DUE DATES

<i>Initiate NCR-RHANL-0497-17 to control and correct the error in the radiological characterization report.</i>	<i>Complete</i>
<i>RH Project manager send an email to all radiological engineers instructing that only Visual Examination BDR data obtained from CCP records are to be used for performing radiological characterization.</i>	<i>September 22, 2017</i>
<i>Initiate a Standing Order Requiring that Visual Examination Batch Data Reports be obtained from CCP Records in order to perform radiological characterization.</i>	<i>October 12, 2017</i>
<i>Revise CCP-TP-513 to incorporate requirements in the Standing Order that VE Batch Data Reports be obtained from CCP Records in order to perform radiological characterization.</i>	<i>January 19, 2018</i>
<i>Provide Closure documentation to NWP Quality Assurance.</i>	<i>January 24, 2018</i>
<i>NWP QA, transmit closure documentation to CBFO</i>	<i>January 26, 2018</i>

Verification:

Verified actions to preclude recurrence are acceptable through review of supporting documentation submitted in the CAR 17-048 closure package. The reviewed documentation included CCP Standing Order CCP-SO-130, Rev. 0, *Using CCP Records Documents for Completing CCP-TP-513 Reviews*, dated 9/21/2017. Further, a revision to CCP-TP-513, Rev. 4, *CCP Procedure for Dimensional or Gravimetric Measurements for Radiological Characterization of Remote-Handled Transuranic Waste*, dated 5/16/2018, was provided as objective evidence that the standing order (CCP-SO-130) was incorporated into the procedure.

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CLOSURE ACCEPTANCE

Based on the results of the review of the objective evidence included in the CAR 17-048 closure package, it is recommended that CAR 17-048 be closed.

Katie Gentry for
Evaluation Performed By: Jim Oliver, CTAC

6-28-18
Date