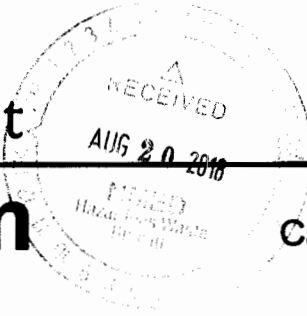


United States Government

Department of Energy

memorandumCarlsbad Field Office
Carlsbad, New Mexico 88221DATE: **AUG 20 2018**REPLY TO
ATTN OF: CBFO:OQA:DCG:JM:18-2007:UFC 2300.00

SUBJECT: Verification and Acceptance of Documentation Supporting Completion of the Corrective Actions for CBFO CARs 18-004 and 18-005

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

The Carlsbad Field Office (CBFO) has verified the documentation provided by the Waste Project supporting completion of corrective actions for CBFO Corrective Action Reports (CARs) 18-004 and 18-005. The CARs 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 and indicate that the documentation of completion of corrective actions for both CARs is acceptable.

The verification concluded that the associated corrective actions for CBFO CARs 18-004 and 18-005 are acceptable. Both CARs are considered closed.

If you have any questions or comments regarding these CAR closures, please contact me at 575-234-7483.

A handwritten signature in black ink that reads "Martin P. Navarrete".

Martin P. Navarrete
Senior Quality Assurance Specialist

Attachment

180820



cc: w/attachment

R. Murray, EM-43 *ED
T. Shrader, CBFO ED
J. Carswell, CBFO ED
D. Miehl, CBFO ED
M. Navarrete, CBFO ED
M. Stapleton, CBFO ED
H. Cruickshank, CBFO ED
J. Zimmerman, DOE-ID ED
T. Jenkins, DOE-ID ED
J. Viet, DOE-ID ED
D. Pruitt, DOE-ID ED
L. Frost, AMWTP ED
R. Hubler, AMWTP ED
G. Byram, AMWTP ED
J. McCoy, AMWTP ED
E. Gulbransen, AMWTP ED
E. Dumas, AMWTP ED
G. Tedford, AMWTP ED
A. Morse, AMWTP ED
J. Floerke, AMWTP ED

J. Walsh, EPA ED
J. Ellis, EPA ED
T. Peake, EPA ED
E. Feltcorn, EPA ED
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. Lerach, CTAC ED
C. Castillo, CTAC ED
J. Vernon, CTAC ED
R. Fitzgerald, 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: 18-004	2. Activity No: S-18-16	3. Page 1 of 2
-------------------	-------------------------	----------------

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) 18-004, including objective evidence submitted via Department of Energy – Idaho Operations Office (DOE-ID) memorandum WDP-AMWTP-18-008, dated August 14, 2018, from Mr. Doug Pruitt, CH-TRU Program Manager, Department of Energy, Idaho Operations Office, to Mr. Casey Gadbury, 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

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.

Verification:

The objective evidence submitted in the closure package was reviewed and verified to meet the required remedial actions commitment. The evidence included the Chemical Compatibility Evaluation (CCE) for BN216, (CCN 319981, dated July 20, 2017) that justifies why “the inadvertent inclusion of RGN 107 to Attachment 3 did not affect the conclusions of the CCE”:

Because this is an aqueous sludge waste stream, water is ubiquitous. All substances that entered the waste are assumed to have come in contact with water. Therefore, RGN 106 was not assigned to any chemical/material as it would be superfluous to state such. Furthermore, all chemicals/materials that are water reactive substances (RGN 107) have already been in contact with water so their energetic reactions have already gone to completion. No RGN 107 chemicals or materials have been added at AMWTP. [CCE Technical Assumption 2]

INVESTIGATIVE ACTIONS

It was determined to be an error in text processing but was also missed during the technical reviews. The only other CCE for BN510 was evaluated and determined to be valid as is. No other action is required.

Verification:

Investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:MPN:JM:18-0999:UFC 2300.00.

CAUSAL ANALYSIS

Not required for this CAR.

CAR CONTINUATION SHEET

1. CAR No: 18-004	2. Activity No: S-18-16	3. Page 2 of 2
-------------------	-------------------------	----------------

ACTIONS TO PRECLUDE RECURRENCE

1. *Revise MCP-4015 to include a step to document to ensure consistency with the RGNs assigned in Attachment*
2. *Provide lessons learned briefing to the acceptable knowledge experts involved in preparation and review of CCE documentation and personnel performing the AMWTP TRU Programs technical reviews.*

Verification:

The objective evidence submitted in this closure package was reviewed and verified to meet the required actions to prevent recurrence. The evidence included (1) the CCE for BN216 (CCN 319981, dated July 20, 2017), (2) a new procedure, i.e., WIP-9, *Preparation of Chemical Compatibility Evaluation and Basis of Knowledge Assessment*, Rev. 0, effective date: 07/31/18, which replaced MCP-4015. WIP-9 was revised to include steps 4.2.8 and 4.2.11 to ensure consistency of RGNs across attachments. The objective evidence also included (3) tailgate training (TG ITG100, *Assuring Consistent RGN Assignment on CCEs*, conducted on 7/31/2018), given to the Advanced Mixed Waste Treatment Project (AMWTP) Acceptable Knowledge Experts and Site Project Managers.

CLOSURE ACCEPTANCE

Based on the results of the review of the objective evidence included in the CAR 18-004 closure package, it is recommended that CAR 18-004 be closed.

 FOR

Evaluation Performed By: Randy Fitzgerald, CTAC

8-16-18

Date

CAR CONTINUATION SHEET

1. CAR No: 18-005

2. Activity No: S-18-16

3. Page 1 of 2

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) 18-005, including objective evidence and supporting documentation, submitted via Department of Energy – Idaho Operations Office (DOE-ID) memorandum WDP-AMWTP-18-008, dated August 14, 2018, from Mr. Doug Pruitt, CH-TRU Program Manager, to Mr. Casey Gadbury, 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

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. A review of the only other CCE for BN510 was performed to ensure that RGN's have been accurately placed in the correct attachments.

Verification:

The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. The evidence included the Chemical Compatibility Evaluation (CCE) for BN216 (CCN 319981, dated July 20, 2017) that justifies why “the inadvertent inclusion of RGN 107 to Attachment 3 did not affect the conclusions of the CCE”:

Because this is an aqueous sludge waste stream, water is ubiquitous. All substances that entered the waste are assumed to have come in contact with water. Therefore, RGN 106 was not assigned to any chemical/material as it would be superfluous to state such. Furthermore, all chemicals/materials that are water reactive substances (RGN 107) have already been in contact with water so their energetic reactions have already gone to completion. No RGN 107 chemicals or materials have been added at AMWTP. [CCE Technical Assumption 2]

INVESTIGATIVE ACTIONS

A review of the only other CCE for BN510 was performed to ensure that RGNs have been accurately placed in the correct attachments.

Verification:

Investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:MPN:JM:18-0999:UFC 2300.00

CAUSAL ANALYSIS

Not required for this CAR.

CAR CONTINUATION SHEET

1. CAR No: 18-005

2. Activity No: S-18-16

3. Page 2 of 2

ACTIONS TO PRECLUDE RECURRENCE

1. *MCP-4010, Collection, Review, and Management of Acceptable Knowledge Documentation, section 4.6 will be revised to convert the note to steps.*
2. *MCP-4015, Preparation of Chemical Compatibility Evaluation and Basis of Knowledge Assessment, will be revised to provide instruction steps for when the report is signed and issued in EDMS.*
3. *Revise the AKA for BNINW216 waste at the WHB, AK Source Document Review Summary, Item 10, Source Document Data Limitations (if any), will be changed to: "This AKA is specific to BNINW216 waste at the Waste Handling Building."*
4. *Revise the AKA for BNINW216 waste at the WHB, Attachment 1, Container Specific Information, to correct and resolve the identified condition.*
- 5a. *Provide justification that the approach was acceptable.*
- 5b. *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.*

Verification:

The objective evidence submitted in this closure package was reviewed and verified to meet the required actions to prevent recurrence. The evidence included a new procedure, i.e., WIP-6, *Collection, Review, and Management of Acceptable Knowledge Documentation*, Rev. 0, effective date: 7/30/2018, which replaced MCP-4010. WIP-6 was revised to include Section 4.7 "AK Briefings."


The evidence also included a new procedure, i.e., WIP-9, *Preparation of Chemical Compatibility Evaluation and Basis of Knowledge Assessment*, Rev. 0, effective date: 07/31/18, which replaced MCP-4015. WIP-9 was revised to include step 4.2.24, which indicates when the Acceptable Knowledge Expert and Site Project Manager/Designee signs the final CCE and submits to the Waste Isolation Pilot Plant (WIPP) Review Coordinator.

The evidence also included a new Acceptable Knowledge Assessment (AKA) memo to file from S. Carpenter, dated Feb. 1, 2018 (CCN 321755), including the AK Source Document Review Summary, with Item 10, Source Data Limitations (if any), that correctly states that the AKA is for "...AMWTP Waste at WIPP Waste Handling Building." In addition, the new AKA memo corrects the discrepancy referencing container 10213598 instead of container 10305406.

The evidence also includes Fluor Idaho CAR No. 116480, which explains that the omission of the intersection of RGN 10 and RGN 23 on Attachment 3 did not impact the conclusions of the CCE. WIP-9 was revised to include a Note after Section 4.2.6: "The chart in the EPA method is incomplete. For example, it erroneously omits reaction codes GF and H for the combination of RGNs 10 and 10, but this information is provided in Appendix 4."

CLOSURE ACCEPTANCE

Based on the results of the review of the objective evidence included in the CAR 18-005 closure package, it is recommended that CAR 18-005 be closed.

 FOR
Evaluation Performed By: Randy Fitzgerald, CTAC

8-16-18
Date