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Department of Energy  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
AUG 21 2018



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

Subject: Verification and Acceptance of Corrective Actions for CAR 18-030 from Audit A-18-14,  
Los Alamos National Laboratory Recertification Audit, conducted May 8 – 10, 2018

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) 18-030. 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 are acceptable. The CAR is considered closed.

If you have any questions regarding the CAR closure, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl  
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

R. Murray, EM	* ED
T. Shrader, CBFO	ED
J. Carswell, CBFO	ED
K. Princen, CBFO	ED
D. Gadbury, CBFO	ED
M. Navarrete, CBFO	ED
M. Stapleton, CBFO	ED
N. Castaneda, CBFO	ED
D. Nickless, EM	ED
B. Covert, NWP	ED
M. Percy, NWP	ED
R. Lee, NWP	ED
B. Pace, NWP	ED
T. Groover, NWP	ED
J. Carter, NWP	ED
C. Tyler, NWP	ED
V. Ballew, NWP	ED
S. Saiz, NWP	ED
A. Boyea, NWP	ED
J. Walsh, EPA	ED
J. Ellis, EPA	ED
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J. Kieling, NMED	ED
R. Maestas, NMED	ED
D. Biswell, NMED	ED
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T. Runyon, CTAC	ED
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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	
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**CAR CONTINUATION SHEET**

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**Block #16 Acceptance of Proposed Corrective Actions:**

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 18-030, including objective evidence and supporting documentation submitted by Nuclear Waste Partnership LLC (NWP) letter QA:18:00239:UFC:2300.00, dated July 20, 2018, from Ms. M. G. McDaniel, Manager, NWP Quality and Contractor Assurance, to Mr. D. S. Miehls, Senior Quality Assurance Specialist, CBFO 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**

- 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.*

**Verification:**

The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. Evidence reviewed included an email from the LANL CCP Project Manager to the Lead Operator discussing the requirements for operational logbook entries, specifically the current revision(s) to AKSR/Waste Streams. Additional documentation reviewed included copies of logbook pages with late-entry corrections indicating the AKSR and revision was checked each day as required.

**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.*

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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 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.*

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*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.*

**Verification:**

The investigative actions, including the impact and extent of condition were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:DSM:JM:18-1907:UFC 2300.00.

**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*

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*Provide closure documentation to NWP Quality Assurance (QA).*

*July 26, 2018*

*NWP QA, transmit closure documentation to the CBFO.*

*August 3, 2018*

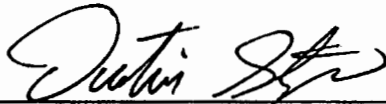
**Verification:**

Verified actions to preclude recurrence are acceptable through review of supporting documentation submitted in the CAR 18-030 closure package. The objective evidence submitted in this closure package was reviewed and verified to meet the required commitment. Evidence reviewed included:

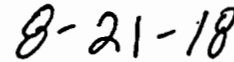
1. Email from the LANL CCP Project Manager to the Lead Operator discussing the requirements for operational logbook entries, specifically the current revision(s) to AKSR/Waste Streams.
2. Copies of logbook pages with late-entry corrections indicating the AKSR and revision was checked each day as required as well as logbook pages with late-entry corrections indicating the software in use is approved and current including software change order (SCO) number, software name, revision, addendum, and change date.
3. Lessons Learned number LL-2018-19 regarding minimum logbook entries required by CCP-PO-005, CCP Conduct of Operations along with personnel date of acknowledgement forms.
4. Briefing number RB #01, Rev. 0, Minimum Logbook Entries Required by CCP-PO-005, Rev. 29 CCP Conduct of Operations. Also included were slides from the briefing and CCP training attendance sheets and date of acknowledgement forms.

**CLOSURE ACCEPTANCE**

Based on the results of the review and verification of the objective evidence included in the CAR 18-030 closure package, it is recommended that CAR 18-030 be closed.



Evaluation Performed By: Dustin Stegman, CTAC



Date