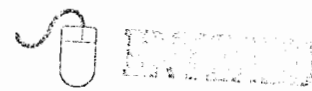




Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
SEP 06 2018



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

Subject: Evaluation of the CAP for CBFO CAR 18-046 Resulting from CBFO Audit A-18-17

Dear Ms. McDaniel:

The Carlsbad Field Office (CBFO) has completed its evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 18-046. As documented on the enclosed CAR Continuation Sheet, the evaluation indicates that the CAP is acceptable.

If you have any questions concerning the evaluation, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

R. Murray, EM	*ED	A. Boyea, NWP	ED
J. Carswell, CBFO	ED	J. Walsh, EPA	ED
D. Gadbury, CBFO	ED	J. Ellis, EPA	ED
C. Fesmire, CBFO	ED	T. Peake, EPA	ED
D. Miehl, CBFO	ED	E. Feltcorn, EPA	ED
M. Stapleton, CBFO	ED	J. Kieling, NMED	ED
N. Castaneda, CBFO	ED	R. Maestas, NMED	ED
T. Carver, CBFO	ED	D. Biswell, NMED	ED
D. Misch, DOE	ED	H. Tellez, NMED	ED
K. Joshi, DOE	ED	M. McLean, NMED	ED
B. Covert, NWP	ED	P. Martinez, CTAC	ED
M. Percy, NWP	ED	M. Leroch, CTAC	ED
R. Lee, NWP	ED	C. Castillo, CTAC	ED
R. Reeves, NWP	ED	J. Vernon, CTAC	ED
B. Pace, NWP	ED	K. Gentry, CTAC	ED
C. Simmons, NWP	ED	P. Hinojos, CTAC	ED
J. Harvill, NWP	ED	G. White, CTAC	ED
J. Carter, NWP	ED	Site Documents	ED
C. Tyler, NWP	ED	CBFO QA File	
V. Ballew, NWP	ED	CBFO M&RC	
S. Saiz, NWP	ED		

*ED denotes electronic distribution



CAR CONTINUATION SHEET

1. CAR No: 18-046	2. Activity No: A-18-17	3. Page 1 of 2
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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) 18-046. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:18:00273 UFC:2300.00, dated August 17, 2018, from Ms. M. G. McDaniel, Manager, NWP Quality and Contractor Assurance, to Mr. Martin P. Navarrete, 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

The CIS Cover Page was annotated, to note that the signature and date of the AKE is not procedurally required. The "Draft" entries for the AKE signature and date were struck from the CIS Cover Page form.

Evaluation:

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

INVESTIGATIVE ACTIONS

Background

The CIS Cover Page identified in the CAR condition, was included in the transmittal of the Waste Stream Profile Form for waste stream AERHDM on November 5, 2013." It was this submittal that included the CIS Cover Page that was noted as "Draft" for both the AKE review and date.

Extent of Condition:

An extensive review of all remote-handled (RH) WSPFs was conducted on August 9, 2018. This review included 23 WSPFs. As a result, there were no other instances identified indicating that this condition is isolated to the WSPF for AERHDM.

Impact of Condition:

The extent of condition revealed that it is isolated to Revision 1 of the WSPF for waste stream AERHDM and ANL. The information presented in the WSPF for AERHDM remains credible and no change to this information is necessary as a result of the CAR condition. Accordingly, the impact of the condition in this CAR is determined to be negligible.

Cause of the Condition:

The investigation results could not specifically conclude the direct cause for the CAR condition. The AKE involved in the review and concurrence of the WSPF, could not recall why "Draft" had been noted

CAR CONTINUATION SHEET

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initially on the CIS Cover Page, since the condition has existed since August 2013 (nearly 5 years). CCP-TP-002 does not require that the AKE sign the CIS Cover Page. Additionally; it would appear that an oversight occurred, wherein the WSPF package (quality record/document) should not have been submitted to records lacking the signature and date of the AKE where indicated on the CIS Cover Page, or annotated as "N/A" on the signature line.

Evaluation:

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

CAUSAL ANALYSIS

Not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

Revise CCP-TP-002 (Attachment 2, Waste Stream Profile Form and Attachment 3, CIS Cover Page)

COMMITMENTS

DUE DATES

Correct the CIS Cover Page in the WSPF package and resubmit to CCP Records

Complete

Revise CCP-TP-002 (Attachment 2, Waste Stream Profile Form and Attachment 3, CIS Cover Page)

January 25, 2019

Provide closure documentation to NWP Quality Assurance (QA).

February 8, 2019

NWP QA, transmit closure documentation to the CBFO.


February 15, 2019

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 18-046, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 18-046 be approved.


Evaluation Performed By: Jim Vernon, CTAC

8-24-18
Date