



United States Government

Department of Energy

memorandumCarlsbad Field Office
Carlsbad, New Mexico 88221DATE: **OCT 16 2018**REPLY TO
ATTN OF: **CBFO:OQA:MPN:JM:18-2093:UFC 2300.00**SUBJECT: **Evaluation of the CAP for CBFO CAR 18-054 Resulting from CBFO Audit A-18-04**TO: **Jim Malmø, DOE-ID**

The Carlsbad Field Office (CBFO) has completed its evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 18-054, resulting from Audit A-18-04, Recertification of the Advanced Mixed Waste Treatment Project (AMWTP), conducted August 27 – 30, 2018. As documented on the enclosed CAR Continuation Sheet, the evaluation indicates that the CAP is rejected. The CAP investigative actions do not address the extent and impact of the deficiency and its results of the investigation in order to provide adequate measures for precluding recurrence.

The required correction action completion due date is October 19, 2018. If this cannot be met, please submit a written request for an extension with a detailed justification and new due date.

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

Martin P. Navarrete
Senior Quality Assurance Specialist

Attachment

181022



cc: w/attachment	
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Site Documents	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 18-054

2. Activity No: A-18-04

3. Page 1 of 3

Block #16 Rejection 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) 18-054. The CAP was submitted via Department of Energy Idaho Operations Office letter CLN190069, dated October 11, 2018 from Mr. James A. Malmø, Assistant Manager, Department of Energy, Idaho Operations Office, and Fluor Idaho letter CCN322734, dated October 10, 2018, from Mr. John C. McCoy, Manager, RH/CH Transuranic Waste Programs to Mr. Martin Navarrete, Department of Energy, Carlsbad Field Office.

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

Schedule surveillances to conduct make up batch validations for the 4th quarter of 2016 and 2017.

- *QA Surveillances 122173 and 122174 were performed and documented on randomly chosen waste containers from Visual Examinations for the 4th quarter of 2016 and 2017. No issues were noted.*

Evaluation:

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

INVESTIGATIVE ACTIONS

Conduct a review of the QA surveillance schedule to ensure Level 1 review, validation, and verification is repeated on the data for a randomly chosen waste container from a Visual Examination (VE) or Real-Time-Radiography (RTR) Batch Data Report to be performed through a QA Surveillance every 3 months.

- *A review of the QA Surveillance schedule was conducted and the schedule revised to require a Level 1 review, validation, and verification is repeated on the data for a randomly chosen waste container from a Visual Examination (VE) or Real-Time-Radiography (RTR) Batch Data Report to be performed through a QA Surveillance every 3 months.*

Evaluation (Rejected):

The investigative actions described above are insufficient to address the condition adverse to quality identified in the CAR. Per CBFO MP 3.1, *Corrective Action Reports*, Revision 15, Attachment III, in order to develop the CAP, perform an investigative action to determine the extent and impact of the deficiency, and the results of the investigation.

CAUSAL ANALYSIS

Cause Code A3B2C04 – Human Performance Less than Adequate (LTA), Rule Based Error, Previous Success in use of rule reinforced continued use of rule.

- *The documented apparent cause analysis determined the failure to perform the quarterly review supporting either a Visual Examination or Real-Time-Radiography data report was due to a*

CAR CONTINUATION SHEET

1. CAR No: 18-054	2. Activity No: A-18-04	3. Page 2 of 3
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misinterpretation of the requirement from the WIPP Waste Analysis Plan. This misinterpretation was applied during the quarterly QA Surveillance planning by including selection of a Non-destructive Assay (NDA) data report from a randomly chosen waste container for performance of the 4th quarter review. The performance of the NDA data review had been mistakenly applied to the requirement from the WIPP WAP.

Cause Code A4B1C01 – Management Problem, Management Methods LTA, Management policy guidance/expectations not well defined, understood, or enforced.

- Several QA surveillances were scheduled by QA management without recognition of the misinterpretation*

Cause Code A5B2C08 – Communication LTA, Written Communication Content LTA, Incomplete/situation not covered.

- WIP-3, Level II Data Validation distinguishes data reporting basis between PLN-5199, Quality Assurance Project Plan (QAPjP) for WIPP WAP requirements specifically for VE and RTR and PLN-5198, AMWTP CH TRU Waste Certification addressing RTR, VE, and NDA to meet the DOE/CBFO QAPD.*
- MCP-4014, Reports to Management section 4.3 which directs the performance of QA surveillances performed for CH-TRU Program quality affecting activities does not include specific requirements to the conduct of the quarterly surveillance which reinforced the misinterpretation applying the WIPP WAP requirement to surveillance of NDA data reporting.*

Evaluation:

The causal analysis described above is appropriate to address the condition adverse to quality identified in the CAR.

ACTIONS TO PRECLUDE RECURRENCE

Revise MCP-4014 to clarify the objectives of the QA quarterly surveillance to meet the requirements of the WIPP Waste Analysis Plan. The revision will require the selection of container data on a randomly chosen waste container to repeat the Level I review, validation, and verification from either a VE or RTR data report every 3 months.

COMMITMENTS

Revise MCP-4014, Reports to Management

DUE DATES

*October 19,
2018*

AMWTP Fluor Idaho QA, transmit closure documentation to the CBFO.

*October 19,
2019*

Evaluation:

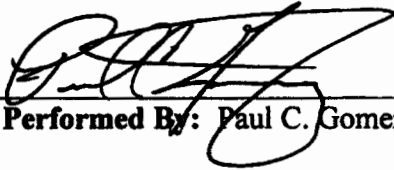
The proposed corrective actions are deemed appropriate to address the condition documented in the CAR and provide reasonable assurance of precluding the likelihood of recurrence.

CAR CONTINUATION SHEET

1. CAR No: 18-054	2. Activity No: A-18-04	3. Page 3 of 3
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REJECTION

The results of the evaluation of the CAP indicate that the remedial actions, causal analysis, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 18-054; however, the investigative actions do not address the extent and impact of the deficiency and its results of the investigation in order to provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 18-054 be rejected.



Evaluation Performed By: Paul C. Gomez, CTAC

10-16-2018

Date